

# EXHIBIT B.5

JEFFREY ADDICOTT DEPOSITION October 2, 2013

Sokolow v. the PLO

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1 MARK I. SOKOLOW, et al, \* IN THE UNITED STATES  
2 Plaintiffs, \* DISTRICT COURT  
3 vs. \* FOR THE SOUTHERN  
4 THE PALESTINE LIBERATION \* DISTRICT OF NEW  
5 ORGANIZATION, et al, \* CIVIL ACTION NO.:  
6 Defendants, \* 04cv397 (GBD) (RLE)

7 \* \* \* \* \*

8 DEPOSITION OF:

9 JEFFREY ADDICOTT,  
10 was held on Wednesday, October 2, 2013,  
11 commencing at 8:01 a.m., at Miller & Chevalier,  
12 655 15th Street, N.W., Suite 900, Washington,  
13 D.C., before Cheryl Jefferies, Certified  
14 Shorthand Reporter.

15 \* \* \* \* \*

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1 I-N-D-E-X  
 2 Deposition of Jeffrey Addicott  
 3 October 2, 2013  
 4 EXAMINATION BY: PAGE:  
 5 Mr. Wise 5  
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 10 239 E-mail dated 21 March, 2013 8  
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 12 240 Expert Report - Americans Killed 12  
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 14 241 Expert Report PA Sponsorship of 12  
 15 Terrorism  
 16 242 Invoice 20  
 17 243 Photocopies from Terrorism Law, 36  
 18 The Rule of Law and the War on  
 19 Terror, Second Edition  
 20 243A Terrorism Law, The Rule of Law 47  
 21 and the War on Terror, Second  
 Edition  
 244 E-mail from Rachel Weiser to 39  
 Brian Hill dated 5/22/13  
 245 TIME Article-The Work of Assassins 52  
 246 Professor Addicott Public Speeches 67  
 247 Addicott Media Appearances 67

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 4 249 U.S. Department of State report 129  
 5 250 Suicide bombing in the Beit 137  
 6 Yisrael neighborhood in Jerusalem  
 7 March 2, 2002  
 8 251 Page from Targeting Terror 168  
 9 by Matthew Levitt  
 10 252 July 9, 2001, Special Dispatch 180  
 11 No. 237, MEMRI  
 12 253 Suha Arafat admits husband 185  
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 15 Brian Whitaker  
 16 255 No Longer Obscure, Memri 194  
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 21 256 Analysis of Attacks in the Last 197  
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 3 261 S. 1377 219  
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 6 264 Fatah and Hamas: The New 238  
 7 Palestinian Factional Reality,  
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 14 267 Terrorism: Near Eastern Groups 257  
 15 and State Sponsors, 2002,  
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 17 268 The Palestinians: Background 261  
 18 and U.S. Relations, Congressional  
 19 Research Service  
 20  
 21 (Original exhibits retained by counsel.)

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<p>1 P-R-O-C-E-E-D-I-N-G-S 2 (Defendants' Deposition Exhibit Number 3 238 was premarked for identification.) 4 WHEREUPON -- 5 JEFFREY ADDICOTT, 6 a Witness called for examination, having first 7 been duly sworn, was examined and testified as 8 follows: 9 EXAMINATION 10 BY MR. WISE: 11 Q. Good morning. 12 A. <b>Good morning.</b> 13 Q. Can you state your name for the 14 record, please? 15 A. <b>Jeffrey Frank Addicott.</b> 16 Q. And, Professor Addicott, what is your 17 home address? 18 A. <b>Currently I'm at 105 Wood Glen in</b> 19 <b>Boerne, Texas.</b> 20 Q. And your Social Security Number? 21 A. <b>215-64-5044.</b></p>	<p>1 A. What portions of it? Well, the report 2 was given to me as a draft, and I made 3 corrections on the draft. Of course, looking at 4 it right now, I can't really recall exactly where 5 the corrections were. So that's my answer. 6 Q. The draft that was provided to you, 7 who provided it to you? 8 A. <b>It was provided by Rachel Weiser, I</b> 9 <b>think is her last name.</b> 10 Q. And what office does she work with? 11 A. <b>I'm not really sure.</b> 12 Q. Are you familiar with a person named 13 Nitsana Darshan-Leitner? 14 A. <b>I have not met her, but I've seen some</b> 15 <b>e-mails with her name on it, yeah.</b> 16 MR. WISE: Can we mark this as 239. 17 (Defendants' Deposition Exhibit Number 18 239 was marked for identification.) 19 BY MR. WISE: 20 Q. Professor, that's Exhibit 239. 21 A. <b>Okay. I see it.</b></p>
Page 7	Page 9
<p>1 Q. I'm going to show you what has been 2 marked as Defendants' Deposition 238. Do you 3 recognize that document? 4 A. <b>I do.</b> 5 Q. And what is it? 6 A. <b>This is a copy of my expert opinion</b> 7 <b>report that's dated 22 March, 2013.</b> 8 Q. On Page 27 of the document, is that 9 your signature? 10 A. <b>It is. It is my signature.</b> 11 Q. And you signed this on March 22nd, 12 2013? 13 A. <b>Yes, I did.</b> 14 Q. And it appears that you had the 15 original notarized; is that right? 16 A. <b>Yes.</b> 17 Q. Declaring under penalty of perjury 18 that the foregoing is true and correct? 19 A. <b>Absolutely.</b> 20 Q. Let me start by asking you what 21 portions of this report did you personally write?</p>	<p>1 Q. 239 is an e-mail from Ms. 2 Darshan-Leitner to you, correct? 3 A. <b>Yes.</b> 4 Q. And the e-mail address, 5 Jaddicott@stmarytx.edu, that is your St. Mary's 6 University Law School e-mail address, correct? 7 A. <b>Yes, it is.</b> 8 Q. Looking at Exhibit 239, was that your 9 first contact with Ms. Darshan-Leitner? 10 A. <b>I can't really recall.</b> 11 Q. What do you recall about your first 12 contact with her? 13 A. <b>Well, I was contacted by several</b> 14 <b>individuals, and they asked me to look at a draft</b> 15 <b>and sent me that draft to see what I thought</b> 16 <b>about the draft, and that was my first contact.</b> 17 <b>But I don't, you know, exactly remember. I look</b> 18 <b>at the dates here, March, it appears to be</b> 19 <b>approximately the time that they contacted me.</b> 20 Q. You said a few people contacted you? 21 A. <b>I think Rachel contacted me and this</b></p>

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<p>1 other individual contacted me. I've never met</p> <p>2 either of them in person, so I can't put a face</p> <p>3 to a name.</p> <p>4 Q. And when they contacted you initially,</p> <p>5 was it by telephone or was it by e-mail?</p> <p>6 A. Telephone.</p> <p>7 Q. Do you know how they came to know</p> <p>8 about you?</p> <p>9 A. I do not know. I would assume, and</p> <p>10 this is just an assumption, that they'd heard</p> <p>11 about the Center For Terrorism Law, where I'm the</p> <p>12 director and the founder. We're an</p> <p>13 internationally recognized institute at the law</p> <p>14 school, so I assume that they probably came</p> <p>15 across my name in media reports or something of</p> <p>16 that nature.</p> <p>17 Q. The substance of the first phone call,</p> <p>18 what do you remember about what they asked you to</p> <p>19 do?</p> <p>20 A. Well, I mean, the main point was to:</p> <p>21 Would I be willing to look over a draft or to</p>	<p>1 Q. Looking at 239, the e-mail, you'll see</p> <p>2 on the bottom of that two attachments.</p> <p>3 A. Right.</p> <p>4 MR. WISE: So let me ask the court</p> <p>5 reporter to mark this document as Exhibit 240.</p> <p>6 (Defendants' Deposition Exhibit Number</p> <p>7 240 was marked for identification.)</p> <p>8 MR. WISE: And this as 241, and I will</p> <p>9 show them to you together.</p> <p>10 (Defendants' Deposition Exhibit Number</p> <p>11 241 was marked for identification.)</p> <p>12 BY MR. WISE:</p> <p>13 Q. Professor, looking at Exhibit 240, do</p> <p>14 you recognize that as the Word document attached</p> <p>15 to Ms. Darshan-Leitner's March 21 e-mail titled</p> <p>16 Expert Report - Americans Killed.doc?</p> <p>17 A. I believe that's correct.</p> <p>18 Q. And do you recognize 241 as the Word</p> <p>19 document titled Expert Report PA Sponsorship of</p> <p>20 Terrorism.doc?</p> <p>21 A. Yes, I believe that's correct as well.</p>
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<p>1 write an expert opinion piece on the subject.</p> <p>2 And as I recall, they had a rather short time</p> <p>3 line, and I said that I would be willing to do</p> <p>4 so.</p> <p>5 Q. How long after that phone call did you</p> <p>6 receive the draft that they had referenced?</p> <p>7 A. Again, if you looked at my CV, you can</p> <p>8 see that I do about a hundred -- well, between 50</p> <p>9 and a hundred media interviews each month. I do</p> <p>10 like five to ten speeches each month. I'm a</p> <p>11 full-time law professor, so a lot of activity</p> <p>12 going on. So I really don't recall, but it was a</p> <p>13 short period. Perhaps days, but I can't recall.</p> <p>14 Q. When they said that they wanted to</p> <p>15 know whether you would be willing to read a draft</p> <p>16 or write a draft about "the subject," what was</p> <p>17 "the subject" as they identified it to you?</p> <p>18 A. Well, it was concerning the issue of</p> <p>19 the Second Intifada and the role that the PLO and</p> <p>20 Yasser Arafat and the PA had played in the</p> <p>21 violence associated with that event in history.</p>	<p>1 Q. The two Word documents, Exhibit 240</p> <p>2 and 241, you did not write these drafts, correct?</p> <p>3 A. No, I didn't pen these drafts; that's</p> <p>4 correct.</p> <p>5 Q. Those were written by someone</p> <p>6 presumably associated with Ms. Darshan-Leitner,</p> <p>7 correct?</p> <p>8 A. I do not know, but I know that she</p> <p>9 sent me those drafts and asked me to look at</p> <p>10 them, to research them, and I did so.</p> <p>11 Q. Do you know who did pen them?</p> <p>12 A. I have no idea.</p> <p>13 Q. Did you ask her who wrote them?</p> <p>14 A. No.</p> <p>15 Q. Do you have any reason to believe that</p> <p>16 you received 240 and 241 prior to the e-mail that</p> <p>17 is marked as 239?</p> <p>18 A. Well, again, I don't think so, but I</p> <p>19 don't know. I see the name on the e-mail. It</p> <p>20 looks vaguely familiar, and I'm assuming that</p> <p>21 that e-mail -- that these two documents as</p>

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1 **attachments are the two documents that reflect**  
 2 **that they are attached in the e-mail.**

3 Q. When you say that you looked at the  
 4 drafts and researched them, what did you do to  
 5 research them?

6 A. Well, the first thing I did, of  
 7 course, is looked at the footnotes, and I've got  
 8 that here. I went through each footnote,  
 9 reproduced a hard copy to look at the footnotes,  
 10 read the paper. I did make some changes to the  
 11 draft, and -- so that's what I did, yeah.

12 Q. When you made changes to the draft,  
 13 did you do it in pen and ink, or did you do it on  
 14 the computer?

15 A. That's a good question. I do not  
 16 recall whether I did it on the paper and scanned  
 17 it and sent it back, or whether I typed it and  
 18 sent it back. I don't recall.

19 Q. And then tell me how the process  
 20 worked after you sent your edits back to them,  
 21 what was the next step?

1 **professional opinion.**

2 Q. The materials in the footnotes, you  
 3 said you compiled those?

4 A. Yeah. Well, I -- yeah, I researched  
 5 them. I mean, I printed them out, looked at  
 6 them, checked to make sure that they're accurate.  
 7 Yeah.

8 Q. Did Ms. Darshan-Leitner send you any  
 9 of the source materials that were cited in the  
 10 footnotes?

11 A. Not that I recall.

12 Q. Do you recall whether there were any  
 13 materials that you were unable to locate?

14 A. Well, I think there was one footnote  
 15 that I was unable to recall, yeah, one that I was  
 16 not able to locate. I think that would be  
 17 Footnote Number 1, which was a YouTube video.

18 Q. And so what did you do when you  
 19 couldn't locate Footnote 1?

20 A. What do you mean what did I do?

21 Q. Did you strike that citation from the

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1 A. Well, I don't have the e-mails in  
 2 front of me, obviously, but I would assume that  
 3 my changes were incorporated into the draft, and  
 4 it was sent back to me to look at again, and  
 5 that's what occurred.

6 Q. Your report -- well, before you signed  
 7 it on the 22nd of March, what did you do to  
 8 review the document to make sure that the changes  
 9 that you had made had been incorporated?

10 A. I read the document.

11 Q. And do you recall whether you read it  
 12 and compared side-to-side the edits that you had  
 13 sent?

14 A. I believe I did because I'm not going  
 15 to sign something unless I adopt it as my  
 16 professional opinion, so I'm pretty meticulous  
 17 about what I sign, so yes.

18 It would be my habit to do so. Again,  
 19 I've written over 60 periodicals. I do a lot of  
 20 writing all the time. But I do not sign anything  
 21 unless I can affirm that it reflects my

1 report?

2 A. No, because it was consistent with  
 3 other, you know, videos that I'd seen, so I  
 4 couldn't locate that precise one, but I did not  
 5 strike that one footnote.

6 Q. What were the other videos that you  
 7 had seen that were consistent with that YouTube  
 8 video?

9 A. Well, they're listed in the footnotes.  
 10 I mean I can read them through with you if you  
 11 want.

12 Q. Other footnotes in the report, you're  
 13 saying, are consistent with Footnote Number 1?

14 A. Well, not just -- yeah, I mean there's  
 15 a mosaic that fits together. So that one  
 16 footnote, though, I couldn't locate the YouTube  
 17 video. I did not view that YouTube video.

18 Q. And that's the only source that you  
 19 did not view before you signed your report?

20 A. That's the only source that I did not,  
 21 could not obtain, that I recall. Let me just



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1 check real quick and see if I've got any others  
2 here. I've got them all labeled.

3 (Witness Reviews Documents.)

4 A. I've got a star here on this one. Let  
5 me see what that says. No, that's good. I've  
6 got a star on this one, on 42. That's good.

7 Q. What was the significance of the  
8 stars, when you put a star next to something?

9 A. These are congressional resolutions  
10 which I found very enlightening.

11 Q. So the star just meant that it was  
12 particularly relevant to your analysis?

13 A. Yes, as when you would highlight  
14 something to recall your attention to it.

15 Q. Can you tell me which documents you  
16 noted you had starred?

17 A. Yeah. Looks like I had put a star on  
18 Footnote 30, 37 and 42. Let me see if there's  
19 anything else. Yeah.

20 Q. So the report that you signed, Exhibit  
21 238, on Page 11 states that your fees for

1 Q. And who was the audience?

2 A. The audience was a -- it is  
3 videotaped, so it was given to a larger, wider  
4 audience, but it was mainly for a law enforcement  
5 officials and a university in Laredo. I think it  
6 was the -- it's one of the Texas universities.

7 Q. Okay.

8 A. But I'd have to check my -- as I said,  
9 I've almost done 700 speeches in the last 10  
10 years, and I'd have to check my notes to see  
11 exactly what that audience was. I do remember  
12 the fee.

13 MR. WISE: Can I have that marked?

14 MR. YALOWITZ: Mr. Wise, they're  
15 looking for speakers if you're interested.

16 (Laughter.)

17 (Defendants' Deposition Exhibit Number  
18 242 was marked for identification.)

19 BY MR. WISE:

20 Q. That is Exhibit 242.

21 A. Yes.

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1 preparation and testimony in the instant matter  
2 are \$300 per hour plus expenses, correct?

3 A. That's correct.

4 Q. How does that fee compare -- well, let  
5 me ask you this: You've spoken about other  
6 speaking engagements?

7 A. Uh-huh.

8 Q. Do you have an hourly fee for those  
9 engagements?

10 A. It depends on the audience.

11 Q. How does your rate in this matter  
12 compare to rates that you charge for other  
13 speaking engagements?

14 A. It depends on the audience. I've been  
15 paid up to \$13,000 for a speech, and I've been  
16 paid zero for a speech, so it just depends on the  
17 audience.

18 Q. The \$13,000 speech, which one was  
19 that?

20 A. That was a speech in Laredo, Texas  
21 about two years ago on border security.

1 Q. Do you recognize that document?

2 A. I sure do.

3 Q. Tell me what it is.

4 A. This is an invoice for payment for  
5 services rendered from 25 July to 13 September,  
6 2013.

7 Q. And who did you send that invoice to?

8 A. I hand delivered this invoice to --  
9 did I give it to you, Tal? It was at our  
10 meeting. I gave it to --

11 Q. You gave it to one of the Plaintiffs'  
12 counsel?

13 A. One of the Plaintiffs' counsel, yeah.

14 Q. And has this invoice been paid?

15 A. I do not know. It's a direct deposit.  
16 I've had one payment already made. I don't  
17 believe this one has been made, but I haven't  
18 checked my direct deposit in several days.

19 MR. YALOWITZ: And I'll just state for  
20 the record that payment is not contingent on Mr.  
21 Addicott's testimony. If it hasn't been paid,

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1 it's a processing issue, not a substance issue.

2 Q. Other than 242, have you sent other  
3 invoices --

4 A. Yes.

5 Q. -- in this matter?

6 A. There was a previous invoice that I  
7 believe I sent by e-mail to -- who did I send it  
8 to? Again, I'm pretty bad with the money.  
9 Probably Nitsana. I probably sent it to Nitsana.  
10 And that was for \$500, and that was my fee  
11 associated with my first white paper.

12 Q. And by your first white paper, you're  
13 referring to the document we've marked as 238?

14 A. Yes.

15 Q. Do you have a copy of that invoice?

16 A. I do not have it with me.

17 Q. But you believe you sent it to Nitsana  
18 Darshan-Leitner?

19 A. I believe so.

20 Q. By e-mail or mail, do you recall?

21 A. It would have to be e-mail.

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1 Q. And that invoice covered all of your  
2 work on Defendants' 238, right?

3 A. It did, but I didn't charge by the  
4 hour for the white paper.

5 Q. Why not?

6 A. Our Center for Terrorism Law is a  
7 nonprofit center, and when I was asked to look at  
8 the paper, I had my research students pull all  
9 the footnotes, so I didn't charge for that time  
10 because I didn't personally pull them myself. I  
11 did review them all, read them all, but I didn't  
12 do the actual labor, and so I didn't charge for  
13 that.

14 I simply charged for my time -- I  
15 didn't really charge for my full time because I  
16 spent many more hours reviewing the draft. I  
17 don't run the Center as a profit organization, so  
18 I'm not there to make money. So the first  
19 instance, I just told her I'd charge a flat fee  
20 to produce this paper.

21 Q. Did you record anywhere the amount of

1 time that you spent reviewing 238?

2 A. No, I didn't, but it was hours. It  
3 was a lot of time.

4 Q. Who were the research assistants that  
5 pulled the source materials for you?

6 A. I've got ten research assistants, and  
7 I did 20 years in the military so I run it as a  
8 military organization. I give the task to my  
9 senior research fellow, and they send that task  
10 down to other law -- these are all law students,  
11 so I don't know exactly who pulled these. My  
12 senior research fellow is Evan Anders.

13 Q. Do you recall any conversations with  
14 Mr. Anders about difficulty in locating any of  
15 the source materials?

16 A. Just the first one.

17 Q. And did you have any conversations  
18 with any of the law students that Mr. Anders  
19 delegated this work to about the source  
20 materials?

21 A. We have a \$700,000 facility at the

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1 school, and the research fellows come and go  
2 quite often so there could have been some  
3 conversations with some of them about it, but I  
4 don't recall.

5 Q. As you sit here today, you don't  
6 recall having any such conversations?

7 A. I may have; I just don't recall.

8 Q. The \$500 fee for this, for Defendants'  
9 238, was that something you agreed upon with Ms.  
10 Darshan-Leitner?

11 A. Yeah. When she first called, probably  
12 about the same time she sent the e-mail with the  
13 draft, and she asked if I could review this  
14 draft, and I said yeah, I would be happy to  
15 review it. That's what our Center does. We do a  
16 lot of pro bono activity, you can imagine. So my  
17 initial thought was that I would review the  
18 draft, and that's what I did.

19 Q. Do you know someone named Avi Leitner?

20 A. Not personally, no.

21 Q. Do you know of him?



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1 A. I've heard the name. I'm trying to  
2 associate it.

3 Q. Where do you think you heard it?

4 A. Probably in the context of this issue  
5 somewhere.

6 Q. By "this issue," what do you mean?

7 A. The draft.

8 Q. Were you ever told that Avi Leitner  
9 was the person who wrote the draft that you  
10 received?

11 A. No. I was never told who drafted it.  
12 I have no idea who drafted it.

13 Q. Looking at 242, which is your invoice,  
14 I take it that is your signature at the bottom?

15 A. Yes.

16 Q. And is there a stamp that's been  
17 affixed to it next to your signature?

18 A. Yes.

19 Q. And who affixed that stamp?

20 A. I did.

21 Q. That is a stamp, I take it, you had

1 A. I'd have to look at the draft again,  
2 but I think I'm recalling that I either reworded  
3 it or added that sentence. Easy to solve if we  
4 look at the draft.

5 Q. So let's take a look at 241.

6 A. Yeah, it looks like I -- again,  
7 obviously it would fit somewhere before the  
8 Arafat launch, but, I mean, I recall that  
9 sentence because, you know, I'm looking at both  
10 sides of the issue from a scholarly perspective.  
11 There's arguments on both sides about what  
12 sparked, you know, the uprising, so that is one  
13 sentence that sticks out in my mind.

14 Q. Any other sentences that you recall  
15 adding?

16 A. That would be a substantive issue  
17 because I didn't agree with the draft, you know,  
18 putting the issue on one side. I felt, from my  
19 scholarship, that there's two sides to it. There  
20 were other changes. I just don't recall what  
21 they were.

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1 created for the Center?

2 A. Yes, one of our stamps.

3 Q. I think you said before that as you  
4 sit here today, you can't tell us exactly which  
5 portions of this document, and by "this", I mean  
6 Exhibit 238, you edited and what was sent to you,  
7 correct?

8 A. I know one portion I did edit.

9 Q. Okay. Which portion is that?

10 A. That would be -- I've got my copy; now  
11 I'm trying to identify the page on your copy so  
12 we can be on the same copy. Give me a second  
13 here.

14 On Page 13, four lines down from the  
15 top, I inserted that sentence where it says,  
16 "Nevertheless, even if one accepts the view that  
17 the 'spark' was not orchestrated, it is clear  
18 that Arafat utilized the incident as an excuse to  
19 orchestrate his planned al-Aqsa Intifada."

20 Q. So that sentence was not in the draft  
21 that was sent to you on March 21st?

1 Q. So your view was that the initial  
2 draft was too one-sided?

3 A. Well, that particular paragraph.

4 Q. And so you added that sentence to even  
5 it out?

6 A. I recall adding that sentence. I  
7 obviously made other changes to the structure of  
8 various sentences and grammar and things like  
9 that. That's just the one that sticks out in my  
10 mind.

11 Q. Well, let's turn to the substance of  
12 the report, and maybe we can identify other  
13 areas.

14 On Page 11 there is a paragraph with  
15 the header "Opinion," correct?

16 A. Yes.

17 Q. The document that you are looking at,  
18 is that a document you brought with you?

19 A. Yes, this is a copy of the one that I  
20 submitted. It appears to be the same one that  
21 you have shown me. I've got this one obviously

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1 **marked up.**

2 Q. And what are the markings?

3 A. **Highlighters.**

4 Q. And what do the highlighters signify?

5 A. **I don't understand your question,**  
6 **"What do they signify?"**

7 Q. Why did you mark it?

8 A. **Because we're doing a deposition**  
9 **today.**

10 Q. Did you mark it in preparation for the  
11 deposition?

12 A. **Oh, yeah.**

13 Q. The Opinions section that we're  
14 looking at starting on Page 11, the last  
15 paragraph, starting with "I will demonstrate  
16 herein" --

17 A. **Uh-huh.**

18 Q. -- this is the paragraph that  
19 essentially summarizes the opinions offered in  
20 this report, correct?

21 A. **That is correct.**

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1 Q. So just so we're on the same page, I  
2 want to make sure we agree on the opinions that  
3 you are adopting by signing this report.

4 The first is that, "The Fatah faction  
5 and the Palestinian Authority were effectively  
6 indistinguishable from one another," during the  
7 Second Intifada.

8 MR. YALOWITZ: Object to the form.

9 A. **Well, that's -- yeah, that's not --**  
10 **that's part of the context of that sentence, but**  
11 **it's not the full sentence.**

12 Q. Well, why don't you tell me the  
13 opinions that you are setting forth in this  
14 report?

15 A. **You want me to read them to you?**

16 Q. Sure.

17 A. **I can read the document if you want.**  
18 **Well, the first paragraph, of course, sets out my**  
19 **qualifications, and then the second short**  
20 **paragraph indicates that I've examined the**  
21 **complaint, which I did thoroughly.**

1 **The third paragraph talks about the**  
2 **fact that this white paper will demonstrate, in**  
3 **the main, that the Fatah faction and the**  
4 **Palestinian Authority were essentially --**  
5 **effectively, rather, indistinguishable from one**  
6 **another. They're both led by Yasser Arafat. In**  
7 **fact, Arafat founded the Fatah party, as we know,**  
8 **and he's the president of the PLO. And there in**  
9 **the relevant time period that we're looking at,**  
10 **he's responsible. He's culpable, "For the terror**  
11 **campaign known as the al-Aqsa Intifada, or Second**  
12 **Intifada, that claimed both Israeli and American**  
13 **lives, among others, during the period relevant**  
14 **to the case." And, "In addition to the hundreds**  
15 **of Israelis killed during this campaign, scores**  
16 **of innocent Americans lost their lives in this**  
17 **conflict. The PA," which stands, of course, for**  
18 **the Palestinian Authority, "was fully aware of**  
19 **the fact that, in its campaign of violence**  
20 **against Israelis, Americans were at risk of**  
21 **falling victim to these attacks. I will identify**

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1 **specific requests by the United States to the PA**  
2 **to stop the violence because American citizens**  
3 **were being killed. I further note that the**  
4 **American casualties continued to mount during the**  
5 **2000-2004 time frame, even after the PA became**  
6 **aware of the danger to American citizens. The**  
7 **intifada continued unabated, and fueled by the**  
8 **Palestinian leadership."**

9 Q. So your opinion is focused on the  
10 actions of the Palestinian Authority and Fatah  
11 during the Second Intifada, correct?

12 A. **Yes, we're looking at that specific**  
13 **time frame, correct.**

14 Q. And that time frame is 2000 to 2004,  
15 right?

16 A. **Right, September 2000.**

17 Q. Turn, if you will, to Page 11 of 238.

18 A. **Going back?**

19 Q. Yes. The first sentence under,  
20 "Opinion," reads, "My opinion as set forth below  
21 is based upon my academic studies, research,

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1 lecturing and publishing over the course of over  
2 thirteen years as a professor of law and Director  
3 of the Center for Terrorism Law, St. Mary's  
4 University School of Law; and lecturer at  
5 numerous academic and professional institutions  
6 around the world, to include the FBI Academy and  
7 other international law enforcement agencies."

8 What academic studies have you  
9 conducted concerning the role of Fatah and the  
10 Palestinian Authority during the Second Intifada?

11 **A. I'm not sure I understand the**  
12 **question. When you say "academic studies," I**  
13 **mean obviously I have been involved with**  
14 **terrorist incidents and organizations for many,**  
15 **many years, so I've done lectures, I've done**  
16 **seminars, I've produced papers, included the**  
17 **terrorism and the incidents of terrorism as part**  
18 **of the framework for studying terrorism. So I**  
19 **guess that's --**

20 Q. And of what you just mentioned, which  
21 specifically dealt with the Palestinian Authority

1 Law textbook?

2 **A. The Seventh Edition, yes.**

3 Q. I'm going to show you excerpts from  
4 the Second Edition, and then I'll ask you about  
5 the Seventh.

6 **A. Second Edition, wow.**

7 Q. Yes.

8 **A. That's a long time ago.**

9 MR. WISE: Can we mark that as 243.  
10 (Defendants' Deposition Exhibit Number  
11 243 was marked for identification.)

12 BY MR. WISE:

13 Q. So do you recognize that, first of  
14 all, as the cover of your book?

15 **A. Yes. As the Second Edition cover,**  
16 **yes.**

17 Q. And when was the Second Edition  
18 published?

19 **A. I don't recall. I'm in the Seventh**  
20 **Edition now, so if you work backwards in time, I**  
21 **do a new edition about every two to three years.**

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1 and Fatah during the Second Intifada?

2 **A. Well, many of them do because they're**  
3 **a classic framework when you look at terrorism**  
4 **and what causes terrorism and how it's motivated**  
5 **and whether or not certain acts of terrorism fall**  
6 **under different categories, for example,**  
7 **state-sponsored or state-supported or substate**  
8 **terrorist groups. What's occurred for a long**  
9 **time with the PLO over the years has been**  
10 **associated with terrorism, so it's wide-ranging**  
11 **discussion that touches almost every field of**  
12 **terrorism.**

13 Q. Which academic studies that you've  
14 just referenced related to the PA and Fatah is my  
15 question. Can you identify a single one?

16 **A. Oh, sure. I'd have to look at my bio.**  
17 **I mean, if you look at my textbook, I've got**  
18 **language in the textbook that identify that**  
19 **category and brand of terrorism. I can't cite**  
20 **the page without having the book in front of me.**

21 Q. Are you referring to your Terrorism

1 **For 2013 -- I'm just trying to imagine. I don't**  
2 **know. I can't recall the date. But, again, I do**  
3 **a new edition about once every two to three**  
4 **years. I'm in the Seventh Edition now, which is**  
5 **almost 600 pages. I think this edition was -- I**  
6 **don't know. It wasn't very big. So I would say**  
7 **maybe 2005, 2004.**

8 Q. We'll turn back to this. I'm going to  
9 get the book so that I don't have to have you  
10 guess.

11 Let me ask you this, though: You  
12 mentioned the PLO before. The PLO is not  
13 mentioned in your opinion as you've just read it,  
14 correct?

15 **A. In my opinion?**

16 Q. Right.

17 **A. The PLO itself? No, I did not put**  
18 **that in the opinion.**

19 Q. You mentioned --

20 **A. I did put it in my second opinion, my**  
21 **rebuttal to the Robinson report, though.**

## JEFFREY ADDICOTT DEPOSITION October 2, 2013

## Sokolow v. the PLO

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1 Q. We'll turn to that a little bit later.  
2 You mentioned before Rachel Weiser, W-E-I-S-E-R,  
3 correct?

4 A. Yes.

5 Q. And who is she?

6 A. **She's an attorney. My impression is**  
7 **she lives in Israel. I've never met her.**

8 Q. Does she represent the plaintiffs in  
9 this case as far as you understand?

10 A. **As far as I understand.**

11 Q. And in the course of preparing for  
12 your deposition in this case, you've had  
13 conversations with Rachel about these academic  
14 studies that you've referred to in this report,  
15 correct?

16 A. **Not in great detail.**

17 Q. Has she asked you specifically which  
18 of these writings relates to the subject of your  
19 report?

20 MR. YALOWITZ: Objection. Instruction  
21 not to answer.

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1 MR. WISE: Let me mark this as 244.  
2 (Defendants' Deposition Exhibit Number  
3 244 was marked for identification.)

4 BY MR. WISE:

5 Q. Professor, I'm going to refer you  
6 specifically to Sub Number 2 on paragraph -- on  
7 Page 1, beginning with "Obviously, the majority."

8 A. Okay.

9 Q. Do you see that paragraph?

10 A. **I see it.**

11 Q. This document is an e-mail from Ms.  
12 Weiser to Brian Hill. Do you see that?

13 A. **I see it.**

14 Q. And in that e-mail, Ms. Weiser writes,  
15 "Obviously, the majority of the over 600 talks  
16 and 3,000 media events would not be on point, but  
17 he provided them all in the interest of full  
18 disclosure. Having worked with various law  
19 enforcement and military organizations across the  
20 globe (to include the IDF and Egyptian military)  
21 Professor Addicott has gleaned much information

1 from first hand observations which were then  
2 coupled with his knowledge of history and law.  
3 Indeed, much of the international terrorism" --  
4 strike that -- "much of international terrorism  
5 emanates from radical Islamic extremism.  
6 Professor Addicott has not specifically written  
7 on the historical development of the PLO or any  
8 particular terror organization but he has often  
9 mentioned these groups in associated talks, etc.  
10 (hence the 'appear throughout' language) and  
11 themes relating to his opinions may," in italics,  
12 "be contained in those media events, speeches and  
13 publishings. However, he cannot recall anything  
14 in particular with the exception of the following  
15 Law Review article that he believes may be of  
16 some interest: American Punitive Damages vs.  
17 Compensatory Damages in Promoting Enforcement in  
18 Democratic Nations of Civil Judgments to Deter  
19 State-Sponsors of Terrorism, 5 University of  
20 Massachusetts Roundtable Symposium Law Journal  
21 192 (Winter 1010)." Having looked at Ms.

1 Weiser's representation, is that accurate as to  
2 your recollection of these previous writings?  
3 A. **Well, not entirely, no.**  
4 Q. What is inaccurate about it?  
5 A. **Well, the sentence about in the middle**  
6 **of the paragraph, where she says, "Professor**  
7 **Addicott has not specifically written on the**  
8 **historical development of the PLO or any**  
9 **particular terror organization," I would say that**  
10 **that's a generalized statement.**

11 Q. That is a generalized statement?

12 A. **Yeah. I mean, I have written on other**  
13 **terrorist organizations. It's true I'm not a**  
14 **historian of the development of the PLO, haven't**  
15 **written on that, but I have written on other**  
16 **terrorist organizations, how they developed.**

17 Q. Have you written on the history of the  
18 Palestinian Authority?

19 A. **I'm not a historian in that degree,**  
20 **no, I haven't written on the history of the**  
21 **Palestinian -- PLO.**



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1 Q. Have you written on the historical  
2 development -- strike that.

3 Have you written on the Palestinian  
4 Authority at all?

5 A. Well, I'd have to look at the over  
6 600, you know, books, articles, book reviews I've  
7 written, but I know I have mentioned the  
8 Palestinian Authority and Yasser Arafat and --  
9 you know, as an example that I use when I speak  
10 on terrorism issues, so I -- I haven't written  
11 any in-depth -- so the part where she talks that  
12 I haven't done any historical development of the  
13 PLO, that's true.

14 Q. Have you written on Fatah?

15 A. Not specifically, no. In other words,  
16 when I've written articles on targeted killing,  
17 obviously you're talking about the Palestinian,  
18 you know, terrorists, and whether they come from  
19 Hamas, Fatah, or, you know, what brand of  
20 terrorism that they represent. I've certainly  
21 written about terrorism in that area on many

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1 occasions.

2 Q. And when you're writing about targeted  
3 killings, you're writing about the legality of  
4 Israel conducting targeted killings against  
5 Palestinians, correct?

6 A. Not against Palestinians. Against  
7 Palestinian terrorists, yes, terrorists that  
8 happen to be Palestinians. I mean, I'm not -- to  
9 me, it's irrelevant if they're Palestinians or  
10 not Palestinians. I'm looking at whether their  
11 acts are legal or illegal, yeah.

12 Q. And is it your testimony that your  
13 writing in that regard focuses on anything other  
14 than the legality of the Israeli action?

15 A. Well, I mean I'm looking at the  
16 legality of Israeli action vis-a-vis the action  
17 of the other side. You know, you've got to  
18 consider what the other side is doing. That fits  
19 into the equation. So it's not a one sided  
20 discussion, no. I look at both sides of the  
21 issue.

1 Q. Can you identify for me, as you sit  
2 here today, a single piece where you have  
3 analyzed the actions of either Fatah or the  
4 Palestinian Authority?

5 A. You mean the historical development of  
6 those groups?

7 Q. No. I mean the actions --

8 A. Well, yeah, of course. When I'm  
9 writing about the issue of targeted killing, for  
10 example, you know, those individuals are coming  
11 from an environment that is associated with the  
12 PLO, with the Fatah, with various organizations.

13 Q. So let's turn earlier in your report,  
14 238.

15 A. Which page?

16 Q. Well, let's start with your list of  
17 books that appears on Page 3.

18 A. Page 3?

19 Q. Yes.

20 A. Okay.

21 Q. And on Pages 3 and 4, you list nine

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1 books, correct?

2 A. At the time, yes, that's correct.

3 Q. Have there been more since March of  
4 2013?

5 A. Yes.

6 Q. And what else? What are the new ones  
7 that are not on this list?

8 A. The new one would be the Seventh  
9 Edition, which is 2014, of the Terrorism Law:  
10 Materials, Cases and Comments.

11 Q. Okay. So between the nine books  
12 listed on Pages 3 and 4 and the new edition of  
13 the Terrorism Law book, please identify for me  
14 which of those books includes your writing on  
15 Fatah and the Palestinian Authority.

16 A. Well, again, I'm looking at the acts  
17 of the -- I haven't done a historical development  
18 of either organization. I don't have that in  
19 there. That's not my function.

20 Q. I'm not asking for historical  
21 development right now. Let's tie this to your

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1 report. Tell me which of these books includes  
2 your writing about the role of Fatah or the  
3 Palestinian Authority during the Second Intifada.

4 **A. Well, again, the Seventh Edition would**  
5 **mention those types of activities, but they're**  
6 **not a detailed analysis of, you know, exactly**  
7 **when this action occurred or how it occurred.**  
8 **That would be in my white paper, where I went**  
9 **into it. I've not analyzed it before this white**  
10 **paper, to that degree.**

11 Q. And by "this white paper," you're  
12 referring to 238?

13 **A. And the rebuttal report.**

14 Q. So those two writings are the only  
15 places where you have done an analysis of PA and  
16 Fatah during the Second Intifada, correct?

17 **A. In writing, yes.**

18 Q. I'm going to hand you, now that we  
19 have it, the book from which the photocopies that  
20 are Exhibit 243 comes.

21 MR. WISE: Would you like to mark that

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1 also?

2 THE REPORTER: It's up to you.

3 MR. WISE: Let's mark that as 243A.

4 (Defendants' Deposition Exhibit Number  
5 243A was marked for identification.)

6 BY MR. WISE:

7 Q. And that's the Second Edition of your  
8 book, correct?

9 **A. That's correct.**

10 Q. What year was it?

11 **A. 2004.**

12 Q. So you said this was published in what  
13 year? I'm sorry.

14 **A. The book indicates 2004.**

15 Q. Is it fair to say that that edition of  
16 the book was the edition printed closest in time  
17 to the time period analyzed in your report?

18 **A. Well, no, because the First Edition**  
19 **would be 2003.**

20 Q. I thought you said they came out every  
21 three years.

1 **A. Well, approximately. If you notice in**  
2 **the cover here, it says First Edition, 2003.**  
3 **This is Second Edition, 2004.**

4 Q. Let's work off of this edition, and  
5 then we'll go back to whether there have been  
6 subsequent changes.

7 This is the textbook that you  
8 referenced before when you pointed to one of the  
9 books in your report, correct?

10 MR. YALOWITZ: Objection.

11 **A. I don't think so, no. That's an**  
12 **edition that's been superseded. I think I**  
13 **referred to the Sixth Edition.**

14 Q. The Sixth Edition, does it have  
15 additional materials about the PA and Fatah that  
16 are not in the Second Edition?

17 **A. I'd have to read the Second Edition**  
18 **again and compare it with the -- that's been**  
19 **years. I haven't looked at that since 2004.**

20 Q. As you think back to writing the  
21 subsequent editions, do you recall researching

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1 and writing on the PA and Fatah for sections of  
2 your book that are different from what's in the  
3 Second Edition?

4 **A. I'd have to look at the Second Edition**  
5 **and compare it. I don't know. It's been a long**  
6 **time ago.**

7 Q. Taking a look at the index of your  
8 book, do you see any mentions or citations to  
9 Fatah?

10 **A. I'm looking at that right now. That**  
11 **was my first thing before you asked the question.**  
12 **This book is a shadow of the one I have now.**  
13 **It's almost embarrassing to look at it.**

14 (Witness Reviews Book.)

15 **A. No, I don't see that. But, again,**  
16 **this is a -- nope.**

17 Q. Do you see any references in the index  
18 to Arafat?

19 (Witness Reviews Book.)

20 **A. No, I do not.**

21 Q. Do you see any references to the PLO?



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Page 52

1 (Witness Reviews Book.)

2 **A. No.**

3 Q. And do you see references to the  
4 Palestinian Authority?

5 (Witness Reviews Book.)

6 **A. Yes, I do.**

7 Q. There are two, correct?

8 **A. Yes, I see two pages that are listed  
9 there, listed in the index, on Page 455.**

10 Q. And what pages cite to the Palestinian  
11 Authority?

12 **A. It says Pages 10 and 169.**

13 Q. Okay. Will you turn to Page 10?

14 **A. Okay.**

15 Q. The citation to the Palestinian  
16 Authority on Page 10 reads, first full paragraph,  
17 "In early 2000, United States and Israeli  
18 intelligence sources reported that Hamas, a  
19 militant Palestinian terrorist group that the  
20 Palestinian Authority denies responsibility for,  
21 was experimenting with chemical weapons in their

1 information, Footnote 69," correct?

2 **A. Yes, that's correct.**

3 Q. Okay. And if you look at Footnote 69  
4 for this chapter, which is on Page 176, the  
5 footnote refers to a TIME Magazine article from  
6 January 15th, 2001, right?

7 **A. Yes.**

8 MR. WISE: We'll mark this, please.

9 (Defendants' Deposition Exhibit Number  
10 245 was marked for identification.)

11 BY MR. WISE:

12 Q. Professor, looking at Exhibit 245, do  
13 you recognize that as the TIME article that you  
14 cited in your book?

15 **A. I'd have to read it. It's been years,  
16 years ago.**

17 Q. Let me call your attention first to  
18 the date and title of the article.

19 **A. Okay, I'm looking at it.**

20 Q. And go ahead and take your time to  
21 read it.

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1 rocket attacks against Israeli targets," correct?

2 **A. That's what it says.**

3 Q. Is there any other reference on that  
4 page to the Palestinian Authority?

5 **A. I'll have to read the page.**

6 (Witness Reviews Book.)

7 **A. I don't see anything else on that  
8 page.**

9 Q. The second reference to the  
10 Palestinian Authority in your index refers to  
11 Page 168, correct?

12 **A. 169.**

13 Q. 169, thank you. So will you turn to  
14 Page 169, please?

15 **A. Okay, I have 169.**

16 Q. And I'll call your attention to the  
17 first full paragraph, nine lines down, that  
18 reads, "The next step is to give the Palestinian  
19 Authority the list of suspects for arrest, which  
20 proves futile due to the fact that the  
21 Palestinian Authority refuses to act on the

1 **A. Oh, okay.**

2 (Witness Reviews Document.)

3 **A. Okay. I've read that article.**

4 Q. Based on the author, title, date and  
5 publication, you would agree with me that this is  
6 the article cited in your book, correct?

7 **A. Let's see. That would be the article  
8 on Page -- let's see, Footnote -- what footnote  
9 was that again?**

10 Q. 69.

11 **A. 69. Okay. That is the article,  
12 that's correct.**

13 Q. And having read it now, would you  
14 agree with me that nothing in that article states  
15 that the Palestinian Authority refuses to act on  
16 information provided by Israel?

17 **A. I believe the footnote should have  
18 been 71. I know Michael Schmitt. And again,  
19 that's why we have other editions to correct  
20 errors when they occur. But it's not directly on  
21 point, but it -- the fact that it's there should**

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1 have been -- it should have been Footnote 71.

2 Q. So you believe that Mr. Schmitt's  
3 article supports the contention you've made in  
4 that sentence on Page 169.

5 A. Well, I believe so. Again, this was  
6 written a long time ago and I'd have to look at  
7 it. It appears to be a typo.

8 Q. Do you have any present recollection  
9 of editing that footnote in subsequent editions?

10 A. Well, not this footnote. I've added a  
11 lot of footnotes in subsequent editions.

12 Q. But this footnote is the one I'm  
13 concerned about.

14 A. I can't recall.

15 Q. Are you familiar with the concept of  
16 peer review?

17 A. Yeah.

18 Q. What is peer review?

19 A. Peer review usually is associated with  
20 tenure. If someone is seeking tenure, you get  
21 scholars in the field to review your work to

1 I've been asked to peer review lots of  
2 stuff, so I assume my publisher did that, but  
3 I -- good question.

4 Q. When you've been asked to peer review  
5 the work of others, I take it that you've then  
6 had discussions with the authors of those pieces  
7 about your findings, correct?

8 A. Well, sometimes.

9 Q. Have you ever been contacted by  
10 another scholar who said that they were doing  
11 peer review of any of your books?

12 A. Well, my Law Review articles, yeah.

13 Q. Okay. But let's start with the books,  
14 and then we'll move to the Law Review articles.

15 As it relates to the books, have you  
16 ever been contacted by another scholar saying  
17 that they were conducting peer review of your  
18 books?

19 A. I'm sure I have. I just can't recall.

20 Q. So let's turn to your Law Review  
21 articles. You said that you know those have been

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1 render an opinion whether or not you are  
2 advancing scholastically to the degree that you  
3 should be granted tenure or put on a tenure  
4 track. Generally that's what the term indicates.

5 It also is used when you write Law  
6 Review articles or other periodicals. A Law  
7 Review will take your draft article, they'll send  
8 it to other scholars to look at it, to make sure  
9 that it is in the main that's appropriate.

10 Q. Have any of the books that you've  
11 listed in your report been peer reviewed?

12 A. Well, all the Law Review articles  
13 have. What I do with my books is generally I  
14 will take the Law Review articles, and if you  
15 notice my Law Review articles, a lot of them  
16 track what's in the book. So while the book may  
17 have not been peer reviewed -- and I don't know.  
18 I mean, the publisher, I'm sure, sends it out to  
19 other scholars. That's not my responsibility to  
20 peer review my own work. It's usually the  
21 publisher will send it out to other scholars.

1 peer reviewed, correct?

2 A. If you've ever written a Law Review  
3 article for a journal, that's what journals do.  
4 They get a lot of Law Review articles that are  
5 submitted to the journal, and -- like the  
6 Kentucky Journal on National Security, I believe,  
7 I wrote an article about interrogation. So  
8 they'll send those -- before they publish them,  
9 they obviously do a peer review and cite check  
10 and they'll notify you whether or not they accept  
11 your article or not, but I've not been involved  
12 in that process. I was not on the Law Review  
13 when I was in law school.

14 Q. Have any of your Law Review articles  
15 that you've written that have been subject to  
16 peer review been about the PA or Fatah?

17 A. I haven't written any articles  
18 directly on the PA or the Fatah. I've written  
19 articles on targeted killing, which obviously are  
20 associated with the killings in the Palestinian  
21 territories.

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1 Q. Let me turn your attention back to the  
2 index to the Second Edition of your book and to  
3 the Michael Schmitt article, Law Review article,  
4 excuse me, that you reference in Footnote 71,  
5 which is on Page 176.

6 **A. You want me to go to Footnote 71?**

7 Q. Yeah.

8 **A. Okay. I'm there.**

9 Q. And if I understood correctly, what  
10 you said was that Footnote 71, you believe, was  
11 the source for the statement on Page 169?

12 **A. I think a better source would be to**  
13 **look at the actual Law Review article that I**  
14 **wrote, because obviously when you write a book,**  
15 **you're not -- you don't put the hundreds and**  
16 **hundreds of footnotes in the book. So if we**  
17 **could get the Law Review that I wrote on targeted**  
18 **killing, we'd probably be able to figure out**  
19 **where the source came from.**

20 **Again, I can't recall at this time**  
21 **what Michael Schmitt's article indicated. That's**

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1 **my assumption because it looks like it's close in**  
2 **time, but it could be another cite. I don't**  
3 **know.**

4 Q. You'd agree with me, at least, that  
5 according to your book, the Schmitt article was  
6 written in 1992?

7 **A. That's what it says, yes.**

8 Q. Which would make it impossible for  
9 that to be the source of information on the  
10 Palestinian Authority, correct?

11 **A. Well, I think that's correct.**

12 Q. Why?

13 **A. Well, the PA, of course, the Oslo**  
14 **Accord's in 1993, so we've got a year -- the**  
15 **dates wouldn't match. The dates wouldn't match.**

16 Q. Because the PA didn't exist in 1992?

17 **A. Right. They existed the next -- 1993,**  
18 **I believe, is when they stood up.**

19 Q. Your report at Page 2 says that you,  
20 "Lecture four times a year at the United States  
21 Federal Bureau of Investigation (FBI) Academy in

1 Quantico, Virginia," correct?

2 **A. Approximately, yes.**

3 Q. What do you lecture on there?

4 **A. Terrorism.**

5 Q. Broadly?

6 **A. Well, broadly and specifically.**

7 Q. Have you ever lectured to the FBI  
8 Investigation Academy about the Palestinian  
9 Authority or Fatah during the Second Intifada?

10 **A. When you say "about," what do you**  
11 **mean? I mean, I don't go into historical**  
12 **development of the organizations, no.**

13 Q. Have you ever discussed the actions of  
14 the PA or Fatah during the Second Intifada in any  
15 of your lectures to the FBI Academy?

16 **A. Well, I concentrate on the act of**  
17 **terrorism and the links, I don't go into great**  
18 **detail about the linkage because I'm looking at**  
19 **the actual events. So I don't do detailed**  
20 **analysis of the links between the Palestinian**  
21 **terrorists and exactly what organization they**

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1 **come from, whether it's Hamas, Fatah, the Martyrs**  
2 **Brigade, no, I don't instruct them on the party**  
3 **membership or the membership of that particular**  
4 **terrorist.**

5 Q. So the answer is no?

6 **A. No.**

7 Q. How long have you been lecturing at  
8 the FBI Academy?

9 **A. I'd have to look at my list of**  
10 **lectures. If you go through the over 600**  
11 **speeches, you can probably go back in time and**  
12 **see the first one. I would say maybe 2004, '5.**

13 Q. Did there come a time that you were  
14 asked not to return for some period?

15 **A. I got a -- about a year and a half**  
16 **ago -- well, the answer is yes.**

17 Q. Tell me the circumstances of that,  
18 please.

19 **A. About a year and a half ago, I got a**  
20 **call from the agent that organizes, had organized**  
21 **a course that I was an integral part of on**

<p style="text-align: right;">Page 62</p> <p>1 <b>terrorism, and he told me his course had been</b></p> <p>2 <b>suspended by higher headquarters. It had nothing</b></p> <p>3 <b>to do with me, but the course itself had been</b></p> <p>4 <b>suspended.</b></p> <p>5 Q. In the speeches that you listed in</p> <p>6 your report, you've cited to a number of things</p> <p>7 that are on YouTube, correct?</p> <p>8 A. My speeches?</p> <p>9 Q. Yes.</p> <p>10 A. Yeah, I've had speeches on YouTube.</p> <p>11 Q. And in at least some of those prior</p> <p>12 speeches, you've talked about how you were asked</p> <p>13 not to come back for some period, right?</p> <p>14 A. Because I was asked not to come --</p> <p>15 well, I wouldn't say not to come back. I was</p> <p>16 told that the program had been suspended.</p> <p>17 Q. Because you had been critical of Janet</p> <p>18 Napolitano?</p> <p>19 A. No, that's never mentioned.</p> <p>20 Q. Do you deny that you said that during</p> <p>21 one of your speeches?</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. Tell me now, as you sit here today,</p> <p>2 what you recollect about any instance where in</p> <p>3 the media you have opined about the PA or Fatah's</p> <p>4 actions during the Second Intifada.</p> <p>5 A. I recall one interesting one because</p> <p>6 those are the ones that stand out. When you've</p> <p>7 done almost 4,000, it's hard to recall, but I do</p> <p>8 recall one on Fox News, I think it was 2004, I</p> <p>9 was debating a PA official high up the chain of</p> <p>10 command -- I can't remember his name, but you can</p> <p>11 probably pull it from Fox News -- about their use</p> <p>12 of violence, their sponsorship of violence</p> <p>13 against Israeli and American civilians. We were</p> <p>14 in a debate. I recall that one.</p> <p>15 Q. How long was that?</p> <p>16 A. How long was the debate?</p> <p>17 Q. Yes.</p> <p>18 A. Well, there's two talking heads. I</p> <p>19 don't know, five minutes. Usually when you do,</p> <p>20 you know, a Fox News or MSNBC, it's between three</p> <p>21 to five minutes.</p>
<p style="text-align: right;">Page 63</p> <p>1 A. I've been very critical of Janet</p> <p>2 Napolitano over the years.</p> <p>3 Q. But are you denying that during one of</p> <p>4 your speeches you said the reason that you were</p> <p>5 not invited back was because you guess you had</p> <p>6 been critical of Janet Napolitano?</p> <p>7 A. I can't recall. I know I've been</p> <p>8 critical of her. I've been critical of President</p> <p>9 Bush. I've been critical of President Obama.</p> <p>10 I've been critical of a lot of people.</p> <p>11 Q. But as you sit here today, you don't</p> <p>12 believe that that criticism had anything to do</p> <p>13 with not being invited back to the FBI?</p> <p>14 A. I can't recall. I've done over 4,000</p> <p>15 media appearances. I cannot recall. You'd have</p> <p>16 to show it to me and I'd have to look at it.</p> <p>17 Q. In the 4,000 media appearances, how</p> <p>18 many times have you opined about the role of the</p> <p>19 PA or Fatah in the Second Intifada?</p> <p>20 A. I don't know. I have, but I can't</p> <p>21 give you a number.</p>	<p style="text-align: right;">Page 65</p> <p>1 Q. Do you remember who the Fox News</p> <p>2 moderator was?</p> <p>3 A. Oh, I can't remember.</p> <p>4 Q. Do you remember whether there was a</p> <p>5 particular incident that had led to Fox News</p> <p>6 doing this story?</p> <p>7 A. It was associated with the Israeli</p> <p>8 push against Ramallah.</p> <p>9 Q. Any particular Israeli push against</p> <p>10 Ramallah?</p> <p>11 A. Well, I guess the tanks were rolling</p> <p>12 into Ramallah. They were engaged in combat with</p> <p>13 elements of the PA and the PLO, I suppose.</p> <p>14 Q. Are you referring to what you've</p> <p>15 spoken about in your report as Operation</p> <p>16 Defensive Shield?</p> <p>17 A. It might have been. Again, it's</p> <p>18 been -- I've done many talks about it. You asked</p> <p>19 me which one stands out. That one stands out.</p> <p>20 Q. And that appearance, I take it, would</p> <p>21 be on your list of prior media appearances?</p>



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1 A. Should be. Although, quite frankly,  
2 not all the media appearances I've done are on  
3 the list, just the volume of it and getting the  
4 secretary to record them, some of them. I would  
5 say that probably there's about 3 to 500 that  
6 probably aren't even on that list.

7 Q. Do you have any reason to believe that  
8 appearance would not be on that list?

9 A. No. I haven't looked at it, though,  
10 for a long time.

11 Q. When you provided that list to counsel  
12 in relation to this litigation, did you check the  
13 list to see whether it included relevant  
14 appearances?

15 A. No. No, I just provided the entire  
16 list that I had.

17 MR. YALOWITZ: Just let him finish his  
18 questions.

19 MR. WISE: Professor, let me know if  
20 you want to take a break. We've been going for  
21 an hour and 20 minutes.

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1 MR. YALOWITZ: I wouldn't mind a  
2 break.

3 MR. WISE: Can we take five minutes?

4 MR. YALOWITZ: I don't need it right  
5 this second, but.

6 MR. WISE: That's fine. Let's take  
7 five.

8 (Brief Recess.)

9 MR. WISE: Can I have these two marked  
10 as 246 and 247.

11 (Defendants' Deposition Exhibit  
12 Numbers 246 and 247 were marked for  
13 identification.)

14 THE WITNESS: I did a hundred month  
15 before -- a hundred and six, so this is supposed  
16 to be a lot thicker.

17 BY MR. WISE:

18 Q. A hundred and six media appearances?

19 A. Media appearances, yeah.

20 Q. Did any of those relate to the role of  
21 the PA or Fatah in the Second Intifada?

1 A. No, they were about Hassan primarily.

2 Q. So looking at 246, that is your list  
3 of public speeches up through March 2nd of 2013,  
4 correct?

5 A. That's correct.

6 Q. And looking at 247, that is your list  
7 of media appearances up through March 23rd of  
8 2013?

9 A. Yes, that's correct.

10 Q. Other than what you've already told me  
11 about, are there any public -- let's start with  
12 the public speeches. Are there any public  
13 speeches that you can recall where you spoke  
14 about specifically the Palestinian authority or  
15 Fatah and the Second Intifada?

16 A. Well, many times. You know, I've  
17 spoken about those organizations and their  
18 participation in terrorist attacks in the context  
19 of a lot of speeches, but I haven't had a speech  
20 that was entitled, as you suggest, the role of  
21 the PLO in the Second Intifada, no.

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1 Q. Aside from the title of the speech,  
2 I'm asking whether any of your public speeches,  
3 you've spoke about the issue of the PA or Fatah  
4 in the Second Intifada?

5 A. I have talked about that in a variety  
6 of speeches over the years.

7 Q. And looking at your list of public  
8 speeches, can you identify for me the speeches  
9 where you spoke about the PA or Fatah and their  
10 role during the Second Intifada?

11 A. Well, every speech you see at the FBI  
12 Academy, I would mention -- that would be part of  
13 the discussion, and so we'd have to look through  
14 the list to see how many speeches are associated  
15 with that.

16 When you see speeches, for example, on  
17 the 21st of August, where it says Radical Islam  
18 and the War on Terror, I would include that as  
19 part of that broader discussion.

20 Q. What page are you talking about? I'm  
21 sorry.

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1 A. That would be Page 3, Number 36.

2 Q. Radical Islam and the War on Terror?

3 A. Yeah. I just pulled that out at  
4 random.

5 Q. Okay. Do you consider the Palestinian  
6 Authority to be part of Radical Islam, as you  
7 define it?

8 A. Yes.

9 Q. Why is that?

10 A. Because of their track record and how  
11 they fit into the framework.

12 My legal expertise is really  
13 associated with the discipline of the legal  
14 aspects of terrorism, so what I do is I look at  
15 the concept -- I have a framework, I guess is a  
16 better way to put it, a legal framework, so if I  
17 can look at a particular organization, government  
18 or state, look at their behavior, what they do, I  
19 plug that into a legal framework and then I come  
20 up with an analysis and a conclusion.

21 Q. So tell me how, in your analysis, the

1 that in the Second Intifada, where they wrapped  
2 themselves in religious themes, martyrdom, Jihad,  
3 and so that fits into that process.

4 Q. Would you similarly consider Fatah to  
5 be part of radical Islam?

6 A. Yes, they have used radical Islamic  
7 extremism as a mechanism to motivate, to insight  
8 and to conduct terror attacks.

9 Q. Do you draw any differentiation  
10 between the PA and Hamas?

11 A. Well, they're two different entities.

12 Q. And what are the differences as you  
13 see them?

14 A. Hamas is more likely to use the  
15 symbols of "radical Islam" to motivate violence.

16 Q. Have you read any scholarly work that  
17 supports your definition of the Palestinian  
18 Authority as part of radical Islam? Or is that  
19 simply your conclusion?

20 A. I've read lots of scholarly works on  
21 that topic.

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1 Palestinian Authority is part of radical Islam.

2 A. Well, it depends on how you define  
3 radical Islam. I define it from the perspective  
4 that they use terrorism and have used terrorism  
5 as a tactic to achieve political or other goals.  
6 Terrorism is a tactic.

7 Q. Islam is a religion, correct?

8 A. Islam is a religion.

9 Q. And it's your view, though, that the  
10 Palestinian Authority is part of radical Islam?

11 A. Could you ask that question again?

12 Q. Tell me how, in your analysis, was the  
13 initial question, tell me how, in your analysis,  
14 the Palestinian Authority is part of radical  
15 Islam.

16 A. It's part of the motivation that you  
17 will see or the ideology that motivates  
18 terrorism, acts of terrorism. So we've seen --  
19 when you plug in the analysis, you'll see that  
20 states will use, or misuse, religion as a  
21 justification for terrorist acts, and we've seen

1 Q. That cite to the Palestinian Authority  
2 as part of radical Islam?

3 A. Well, yeah.

4 Q. Can you name for me what those are?

5 A. Well, not off the top of my head. I  
6 can write a research paper on it. I mean, it  
7 would take me some time to research the issue,  
8 but it's pretty much common knowledge in the  
9 field that they have used co-op'd religious  
10 symbols, signs, motivations to inspire, direct,  
11 solicit people to engage in terrorism. As I said  
12 in my white paper, I've got statements in their  
13 own words by these people.

14 Q. What's your basis for saying it's  
15 common knowledge in the field that the  
16 Palestinian Authority is part of radical Islam?

17 A. Well, my basis comes really from a  
18 wide range of sources. I think one, their own  
19 words, as I indicated in my white paper. You can  
20 read it, and you don't have to read the original  
21 languages to know exactly what they are doing.



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1 Q. But you can't cite to me a single  
2 scholarly source where another academic has said  
3 the Palestinian Authority is part of radical  
4 Islam, right?

5 **A. I could, but I can't do it right at  
6 this second.**

7 Q. What would you need to do to be able  
8 to do it right at this second?

9 **A. Well, it wouldn't be at this second.  
10 I'd have to go back and research the issue and  
11 compile them. You've got a lot of literature  
12 that talks about the connection of the PA.  
13 You've got -- as I've got in my white paper,  
14 we've got seized documents, a lot that the  
15 Israelis seized that show a connection between  
16 those two links. You've got congressional  
17 resolutions that would make certain findings of  
18 fact that I've put out in my white paper. You've  
19 got media reports that cover the topic by a  
20 variety of sources.**

21 Q. So you're referring to the sources

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1 that are cited either in this initial report or  
2 in your rebuttal report, correct?

3 **A. Well, some of the sources. There's  
4 many, many more. If you're going to research  
5 that particular issue, then I imagine you could  
6 write hundreds of pages on the topic.**

7 Q. Are their other sources of scholarship  
8 or evidence that you are aware of that you  
9 omitted from either this report or your rebuttal  
10 report?

11 **A. Am I aware of other sources that I  
12 omitted?**

13 Q. That you omitted?

14 **A. There are hundreds of other sources  
15 that I've not put in the report.**

16 Q. You've personally reviewed these  
17 sources?

18 **A. It's pretty much common knowledge.**

19 Q. You personally reviewed these sources?

20 **A. Well, I haven't read every word in  
21 every source that's out there, no. No one has.**

1 Q. Professor Addicott, are you saying  
2 that there are bases for your opinion that you  
3 have omitted from your report or your rebuttal  
4 report that support your conclusion?

5 MR. YALOWITZ: Object to the form.  
6 Objection.

7 **A. Well, I would say that, you know, as a  
8 scholar, I look at a lot of different sources  
9 and, again, I plug that information, whether it  
10 comes from -- I've just got a selected, you know,  
11 group of sources in these reports. If I had the  
12 time, I could produce a greater volume of  
13 material with obviously many, many more sources,  
14 but I was not asked to put every source that is  
15 out there in this report. That would encompass a  
16 lot of time.**

17 **So I'm satisfied that the sources that  
18 I have developed are enough to convince the  
19 reasonable person that these facts are correct  
20 and my conclusions are correct.**

21 Q. Let's turn to your initial report.

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1 First of all, you did not compile the sources for  
2 this initial report, right?

3 **A. For the initial report, I didn't pen  
4 the initial report, but everything in the initial  
5 report I have adopted, and it reflects my  
6 professional opinion exactly.**

7 Q. But you didn't add a single footnote  
8 to the text that was sent to you that makes up  
9 your initial report, correct?

10 **A. I can't say that. I don't recall. I  
11 would say if I did, it wasn't very many.**

12 Q. You said you reviewed all of the  
13 sources that are cited in this report?

14 **A. To my knowledge, except for that one.  
15 But, again, it's been awhile, since March. But I  
16 did produce all the ones that I could find. The  
17 one stands out in my mind, the YouTube video,  
18 but -- so I'll just say yes.**

19 Q. And did you review them all before you  
20 signed it?

21 **A. Yes.**

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1 Q. Just to wrap up our last line of  
2 questions: Are there any sources that you can  
3 think of, as you sit here today, that support  
4 your conclusion that the PA and Fatah were  
5 involved in the Second Intifada, but which you  
6 excluded from either your report or your rebuttal  
7 report?

8 **A. That I excluded from the report? No,**  
9 **I can't think of any sources that I -- well, I**  
10 **can't think of it this time, but if I had more**  
11 **time to write a more detailed report, I'm**  
12 **confident that I could increase those sources**  
13 **10-fold.**

14 Q. Professor, was there a time limit put  
15 on your drafting of your rebuttal report?

16 **A. I think there was. I think I was told**  
17 **that the report had to be in by a fixed date. I**  
18 **can't remember what the date was.**

19 Q. And who told you that?

20 **A. I don't recall.**

21 Q. Was it in writing, or was it oral?

1 MR. YALOWITZ: Objection. Instruction  
2 not to answer. Don't answer it.

3 MR. WISE: I'll come back to it.

4 Q. You said in your report that you have  
5 provided expert testimony -- and I'm on Page  
6 10 -- in the case of United States versus David  
7 Staffel, correct?

8 **A. That's correct.**

9 Q. That was a --

10 **A. Article 32 investigation.**

11 Q. Regarding a shooting in Afghanistan?

12 **A. Yes, he was charged with murder.**

13 Q. Did not involve any issues related to  
14 the PA or Fatah or the Second Intifada?

15 **A. No. It was a Taliban extremist.**

16 Q. You've also written that you've  
17 testified before the United States Congress and  
18 the Senate, correct?

19 **A. Correct.**

20 Q. Does any of that testimony involve the  
21 Palestinian Authority, Fatah, or the Second

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1 **A. I don't recall. If I had to say, I**  
2 **would probably say it was Rachel Weiser that told**  
3 **me that.**

4 Q. Did you ever communicate to Rachel  
5 that there were many more sources but that you  
6 just couldn't include them in the rebuttal  
7 because you had run out of time?

8 MR. YALOWITZ: Objection. Instruct  
9 you not to answer.

10 **A. I can tell you my professional --**

11 MR. WISE: You're instructing him not  
12 to answer what he told counsel?

13 MR. YALOWITZ: Right. I'm instructing  
14 him not to answer that question.

15 MR. WISE: Let me try it another way.

16 Q. You've just told us that there are  
17 many more bases for your opinion than what's  
18 contained in your report, correct?

19 **A. In my opinion, yes.**

20 Q. Did you communicate that to Rachel or  
21 any other of the lawyers for the plaintiffs?

1 Intifada?

2 **A. No.**

3 Q. You wrote in your report that you  
4 filed two Amicus briefs with the United States  
5 Supreme Court, correct?

6 **A. Correct.**

7 Q. What were the names of those cases?

8 **A. I can't recall.**

9 Q. Did either of them involve the  
10 Palestinian Authority, Fatah or the Second  
11 Intifada?

12 **A. No, they were directed at Saddam**  
13 **Hussein.**

14 Q. If you recall the e-mail that I showed  
15 you from Rachel Weiser to Brian Hill?

16 **A. Yes.**

17 Q. What's the number?

18 **A. 244.**

19 Q. Thank you. You'll see in the  
20 paragraph that we read before there was a  
21 reference to you having worked with military

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1 organizations across the globe, to include the  
2 IDF and Egyptian military, correct?

3 **A. Yes.**

4 **Q. Can you tell me about your work with**  
5 **the IDF, starting with what the IDF is?**

6 **A. Israeli Defense Force. My first**  
7 **contact -- do you want the entire background?**

8 **Q. Yes.**

9 **A. Probably in the 1990s, maybe 1995, I**  
10 **taught at the Judge Advocate General School in**  
11 **Charlottesville, Virginia. I was the deputy**  
12 **chief for the operational law division. We**  
13 **taught, amongst other things, terrorism.**

14 **We had four military officers, legal**  
15 **officers, that would attend the courses in**  
16 **residence. We'd have Israelis, Egyptians,**  
17 **Kuwaitis, Saudis. Most of the officers would be**  
18 **from the Middle East, as a matter of fact.**

19 **And in our curriculum, we would**  
20 **encourage discussion about causes, effects of**  
21 **terrorism, and get the perspectives of these**

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1 **officers, how they viewed the issues. One of the**  
2 **officers that I met at that time is now a**  
3 **professor at the University of Denver Law School.**

4 **Q. What's that person's name?**

5 **A. His name is -- it will come to me. It**  
6 **starts with a G. It's an Israeli name. Right on**  
7 **the tip of my tongue. I can't remember his name**  
8 **right now, but I subsequently met him on my first**  
9 **trip to Israel after I had retired from the**  
10 **military in 2000.**

11 **Q. So the meeting started in 1995, you**  
12 **said, correct?**

13 **A. A lot of meetings with different**  
14 **Israeli officers and Egyptian officers and, as I**  
15 **said, officers from the Middle East, and we would**  
16 **teach terrorism. I had taught there for three**  
17 **years. So there was quite a few officers from**  
18 **different countries around the world, and we were**  
19 **very anxious to get their perspectives.**

20 **Q. And that went from '95 to '98, you**  
21 **said, right?**

1 **A. Probably '93 to '95, as I look back on**  
2 **it now.**

3 **Q. Those sessions, you'd agree with me,**  
4 **did not deal with the Second Intifada obviously?**

5 **A. No, no, but they did deal with**  
6 **terrorism.**

7 **Q. Terrorism involving the Palestinian**  
8 **Authority?**

9 **A. Yes. Well, terrorism involving the**  
10 **Palestinians in the territories.**

11 **Q. Which Palestinians?**

12 **A. Well, we basically looked at the**  
13 **issue. Again, I'm not -- my expertise is not in**  
14 **the origin of these groups and the historical**  
15 **development and the personnel that come and go**  
16 **amongst the groups. My expertise is in looking**  
17 **at the groups in terms of their behavior and**  
18 **plugging that into a framework that's well**  
19 **recognized as a national security discipline.**

20 **Q. But you are not seeking at this time,**  
21 **1993 to '95, to differentiate between the various**

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1 **Palestinian actors?**

2 **A. No. We were looking at the acts.**

3 **Q. And even to this day, your expertise**  
4 **is not to differentiate between the various**  
5 **Palestinian actors, correct?**

6 **A. Well, no, that's not correct. That's**  
7 **part of the framework of the analysis. You have**  
8 **to make a distinction.**

9 **Q. So let's back up then to the '93 to**  
10 **'95 time period. What distinctions were you**  
11 **drawing between the various Palestinian actors**  
12 **that you were speaking to the Israeli IDF folks**  
13 **about?**

14 **A. Well, we were looking at the**  
15 **culpability and the hierarchy of where the**  
16 **terrorist acts emanate from, what motivates them,**  
17 **you know, who funds them, how they controlled, so**  
18 **those types of issues were discussed.**

19 **Q. About the Palestinian Authority?**

20 **A. Well, no, it would be just the**  
21 **Palestinian -- at that time the Palestinian, you**

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1 know, PLO, the Palestinian Liberation  
2 Organization, and their role in these types of  
3 activities, so I didn't -- again, I wasn't  
4 concentrating on the historical development of  
5 the groups at that time. In fact, the discipline  
6 of terrorism law hadn't been created at that  
7 time.

8 We were, again, concentrating at that  
9 early stage on the acts and the motivation for  
10 the acts, so we didn't discuss particular groups  
11 and draw the linkage at that time. We were more  
12 concerned with the legality of it, and training  
13 our military lawyers.

14 Q. Training your military lawyers on what  
15 discipline?

16 A. Well, at that time we called it  
17 operational law.

18 Q. What does that mean?

19 A. It was a term that was coined in 1992,  
20 and it deals with all the legal aspects  
21 associated with deployment outside the

1 2005.

2 Q. And what was the circumstance of your  
3 first visit?

4 A. You have to forgive me. I literally  
5 have done a lot of countries. I believe, to the  
6 best of my memory without checking my notes, that  
7 it was a trip to Herzliya, at the Institute for  
8 Counter-Terrorism, ICT. It's run by Boaz Ganor.

9 Q. And who is that?

10 A. Amos Guiora, that's the law professor,  
11 and that's the person I couldn't remember.  
12 A-M-O-S, Guiora, G-U-I-E-O-R-A (sic), but I'm not  
13 sure.

14 Q. Who is Boaz Ganor?

15 A. He is the director of the Institute  
16 for Counter-Terrorism, located in Herzliya,  
17 Israel.

18 Q. And what is the Institute?

19 A. It's a think tank, basically, attached  
20 to one of their universities there.

21 Q. What was the cause of your trip over?

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1 continental United States in the context of  
2 hostilities.

3 Q. So essentially it was focused on the  
4 rules of engagement that governed actions?

5 A. Part of it.

6 Q. Was any of it focused on identifying  
7 the role of either the Palestinian Authority or  
8 Fatah in acts of terror?

9 A. No, that was beyond our scope at that  
10 time.

11 Q. So you said '93 to '95. When was the  
12 next time you visited Israel? Sorry, no. Did  
13 you visit Israel during the '93 to '95 time  
14 frame?

15 A. I never visited Israel when I was in  
16 the military. I retired in 2000.

17 Q. When was the first time you visited  
18 Israel?

19 A. I'd have to check my passport. I've  
20 visited a lot of countries over the last ten  
21 years. I would say probably 2004, 2005. I'd say

1 A. He has an annual conference on  
2 terrorism, and they had invited me to come  
3 participate in a panel discussion and also to  
4 deliver a lecture, if I recall.

5 Q. And did you do both?

6 A. Yes.

7 Q. What was the topic of the panel  
8 discussion?

9 A. I cannot recall.

10 Q. Was it about the Palestinian Authority  
11 or Fatah in relation to the Second Intifada?

12 A. Yeah. The topic was about terrorism  
13 and the activities that had been -- well, the  
14 fact that Israel had been targeted by terrorists,  
15 so that was the topic.

16 Q. But when you spoke in your lecture,  
17 were you speaking about the Palestinian Authority  
18 and Fatah and the Second Intifada?

19 A. I probably was.

20 Q. Why do you say "probably"?

21 A. I've done hundreds and hundreds and

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1 hundreds and hundreds and hundreds of speeches.  
 2 I would assume that if I was in Israel at that  
 3 time, that that would have been the topic,  
 4 without checking my notes. I just honestly  
 5 cannot recall. But to the best of my knowledge,  
 6 that's probably what the topic was about.

7 I do remember in all the panel  
 8 discussions that Boaz would put on, he would put  
 9 on perspectives from -- well, he put on different  
 10 perspectives. It wasn't a preaching-to-the-choir  
 11 conference.

12 Q. Were there Palestinians that spoke at  
 13 the conference?

14 A. There were Palestinians there.

15 Q. Who were they?

16 A. I don't recall.

17 Q. What roles did they serve?

18 A. I'm sorry?

19 Q. What roles did the Palestinian  
 20 speakers serve?

21 A. I don't know what positions they

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1 served.

2 Q. Do you know what positions they held?

3 A. I can't recall. I would assume they'd  
 4 be an elevated position of some sort because --

5 Q. Why would you assume that?

6 A. I would assume they would be fellow  
 7 scholars that he had invited to participate  
 8 because of the scholarly nature of the  
 9 organization. I would assume they had some  
 10 background, some credentials to offer an opinion.

11 Q. On the panel discussion that you were  
 12 involved in at that conference, what was the  
 13 topic?

14 A. I don't recall. I would assume, if I  
 15 had to take a guess, it would be about --

16 MR. YALOWITZ: Don't guess.

17 A. I mean, I don't recall.

18 Q. So that was your first trip, you said,  
 19 in 2005, correct?

20 A. To the best of my knowledge. It might  
 21 have been 2006, but it could have been 2005.

1 Q. How long were you in Israel for that  
 2 trip?

3 A. Probably two days, three days.

4 Q. Did you visit either the West Bank or  
 5 Gaza during that trip?

6 A. I don't recall.

7 Q. Have you ever been to the West Bank or  
 8 Gaza?

9 A. Not to Gaza. I crossed over into the  
 10 West Bank.

11 Q. How long were you in the West Bank?

12 A. Oh, no more than just a day, part of a  
 13 day.

14 Q. What was the occasion for your trip to  
 15 the West Bank?

16 A. I was with some Israelis that I'd gone  
 17 into the West Bank to look at some of the  
 18 security apparatus that had been built by the  
 19 Israelis to protect themselves from terrorist  
 20 attacks.

21 Q. Do you remember who the Israelis were?

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1 A. Military officers. I don't remember  
 2 their names.

3 Q. Do you remember what positions they  
 4 held?

5 A. They were officers.

6 Q. You may have answered this already:  
 7 How long were you there in the West Bank for?

8 A. I didn't spend the night.

9 Q. Was that the only time you've been to  
 10 the West Bank?

11 A. I think I went one other time.

12 Q. Did you have meetings with any  
 13 Palestinian Government officials during the first  
 14 visit that you've described?

15 A. Not on the West Bank, but I did at the  
 16 conference. And I've been to other conferences  
 17 in Israel where I've had discussions with  
 18 Palestinian scholars.

19 Q. Can you recall the names of any of  
 20 them as you sit here today?

21 A. Not at this time.



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1 Q. Have you written about your  
2 conversations with those scholars in any of the  
3 writings that you've cited?

4 A. No. Not directly.

5 Q. Have you done it indirectly?

6 A. Well, obviously they influence your  
7 thinking. You want to gather information from  
8 different sources, and so yes, I mean, there  
9 would be an indirect influence.

10 Q. Is there a place in your previous  
11 writings where you've written something like,  
12 "According to Palestinian sources," and then  
13 written a conclusion?

14 A. I'd have to check my article on  
15 targeted killing that I wrote -- I think I wrote  
16 that for the Kentucky Law Journal, or I'm not  
17 sure which law journal it came in. I don't  
18 recall.

19 Q. But that's the one article that you  
20 think might include such a reference?

21 A. Yes.

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1 Q. You noted that you had lived in Egypt,  
2 correct?

3 A. I visited Egypt.

4 Q. When did you visit?

5 A. At least two occasions.

6 Q. Can you tell me about the first?

7 A. The first was a conference on  
8 terrorism at the Marriott Hotel, 2006, 2007.

9 Q. Who sponsored the conference?

10 A. I think it was the Egyptian  
11 Government.

12 Q. And what did you speak about?

13 A. I spoke on terrorism, and the lack of  
14 a international definition for the term was the  
15 theme of my talk.

16 Q. Did that talk reference the  
17 Palestinian Authority or Fatah during the Second  
18 Intifada?

19 A. Not directly.

20 Q. You said that was the first visit to  
21 Egypt. When was the second?

1 A. Probably a couple years later.

2 Q. And what was the occasion for that  
3 visit?

4 A. That was a cyber terrorism conference.

5 Q. Cyber terrorism meaning the use of  
6 computers?

7 A. Uh-huh, engaged in terrorism.

8 Q. And who sponsored that conference?

9 A. That was sponsored in part by a French  
10 company. It was organized by Dr. Mohammed -- it  
11 will come to me.

12 Q. Was he a government official?

13 A. He's a judge in Egypt. I've had him  
14 come to my Center to speak in the United States,  
15 so I'm ashamed I can't remember his last name.

16 Q. What year was this second visit?

17 A. A couple of years after the first  
18 visit.

19 Q. And in your discussion of cyber  
20 terrorism, did you address the involvement of the  
21 PA or Fatah in the Second Intifada?

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1 A. Not directly.

2 Q. How did you do it indirectly?

3 A. In the second event or the first one?

4 Q. Well, let's start with the second.

5 How did you indirectly speak about the PA and  
6 Fatah in the Second Intifada in a speech about  
7 cyber terrorism?

8 A. I recall that the speech had a part in  
9 it when there was tensions or conflict between  
10 the Palestinian Authority or the PLO or the PN  
11 and Israel, you would see a spike in cyber  
12 activity, and drew some parallels between that.  
13 And cyber activity, I mean by harmful cyber  
14 activity.

15 Q. During the Second Intifada?

16 A. Again, that was years ago, but I'm  
17 sure when I delivered the speech, I had done some  
18 research on that. As I recall, I did have some  
19 stats about the spike in cyber warfare, cyber  
20 terrorist activity against the Israelis, the  
21 servers, and the correlation was when you have,



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1 you know, spikes in actual physical violence,  
2 you'll see a correlation between the cyber  
3 attacks increasing.

4 Q. Have you retained your research on  
5 that subject?

6 A. Most of the notes, I do. And, again,  
7 many of the speeches I do, I prepare notes, but I  
8 don't have a good habit of keeping them.

9 Q. Have you written on the subject of the  
10 PA and Fatah's use of cyber terrorism?

11 A. I've written on cyber terrorism, but I  
12 think when I wrote my latest chapter on cyber  
13 terrorism, that I revised it and I kept it -- I  
14 didn't go into specific instances or, you know --  
15 I think I used as an example, when I edited the  
16 thing, China.

17 Q. Have you ever lived in Kuwait?

18 A. I haven't lived in Kuwait, but I  
19 visited Kuwait.

20 Q. What was the circumstance of your  
21 visit to Kuwait?

1 curriculum that, you know, they -- so I don't  
2 know. We obviously -- I don't know.

3 Q. It states in your initial report that  
4 you served as a senior legal advisor for the  
5 United States Army Special Forces?

6 A. I did.

7 Q. When was that?

8 A. I was the senior legal advisor from  
9 1995 to 1997, right when I left the JAG School.

10 Q. So I take it, obviously, then, that  
11 none of that teaching involved a PA or Fatah  
12 during the Second Intifada, correct?

13 A. I wasn't doing any teaching on that  
14 job.

15 Q. I'm sorry, none of your advising  
16 involved advising on the PA or Fatah in relation  
17 to the Second Intifada?

18 A. No, the Second Intifada hadn't  
19 occurred.

20 Q. You wrote that you were the Deputy  
21 Chief of the International and Operational Law

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1 A. I was asked to develop the curriculum  
2 at the Kuwaiti University, for terrorism.

3 Q. And what year was that?

4 A. About four years ago, approximately.

5 Q. And did you create a written --

6 A. Yes, I did. I --

7 Q. -- document for that?

8 MR. YALOWITZ: You just got to let him  
9 finish.

10 THE WITNESS: I'm sorry.

11 Q. Did you create a written document in  
12 relation to your work in Kuwait?

13 A. Yes.

14 Q. And is that cited in your list of  
15 prior writings?

16 A. It wasn't published, so I didn't cite  
17 it.

18 Q. Did any of that involve discussions of  
19 the Palestinian Authority or Fatah during the  
20 Second Intifada?

21 A. I'd have to look at the written

1 Division of the Pentagon?

2 A. Yes.

3 Q. What years was that?

4 A. That would have been '97 to '99.

5 Q. So that, again, was predating the time  
6 period covered in your report?

7 A. Yes.

8 Q. Let's turn to your report, sir, and I  
9 want to start with the section on Page 13. The  
10 very top line, the report states, "Faluji was  
11 quoted as saying that the violence was 'planned  
12 since [Arafat] the President returned from the  
13 recent talks at Camp David' when peace talks  
14 collapsed in July 2000, Footnote 1."

15 A. Uh-huh.

16 Q. That is the footnote that you have  
17 spoken about before as being unable to locate,  
18 correct?

19 A. I did not view it. I did not view  
20 that YouTube footnote.

21 Q. The report, if you'll turn with me to

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1 Page 15, at the first full paragraph, your report  
2 discusses document seized from PA offices by the  
3 Israeli military during Operation Defensive  
4 Shield, right?

5 **A. Correct.**

6 Q. And through the rest of that page and  
7 the first two lines of the next page, you cite  
8 four times to a report produced by the Israeli  
9 Ministry of Foreign Affairs, correct?

10 **A. Yes, that's correct.**

11 Q. How many documents were seized during  
12 Operation Defensive Shield?

13 **A. The number of documents? I don't  
14 know.**

15 Q. Have you viewed any of the documents  
16 that were seized?

17 **A. I viewed translations of the  
18 documents.**

19 Q. Who did the translations?

20 **A. I do not know.**

21 Q. Where did you obtain the translations?

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1 **A. Well, I obtained them from the source  
2 that cite it.**

3 Q. Other than the source that cite it,  
4 have you done any other independent translation  
5 of the documents that were allegedly seized?

6 **A. No, I haven't.**

7 Q. Have you viewed any other reports  
8 about those documents other than the report that  
9 you cited in your report?

10 **A. I cite the congressional resolutions  
11 that reference these documents, so they came to  
12 the same conclusion I did.**

13 Q. And what was your conclusion?

14 **A. They're authentic.**

15 Q. And tell me all of the bases for your  
16 conclusion that the documents were authentic.

17 **A. Well, I think the primary source would  
18 be the fact that our Congress, in a bipartisan  
19 demonstration in the resolutions that I've cited,  
20 have found as a finding of fact that they are  
21 what they purport to be.**

1 **Second, I think it's reasonable to  
2 conclude that if they'd been adopted by the  
3 Israelis, then I would presume that what they're  
4 purporting to be true, is true.**

5 Q. When you read a statement from the  
6 Israeli Government, do you uniformly accept that  
7 statement to be true because of its source?

8 **A. When I read a statement by any  
9 government, my first question is what is the  
10 government? If it's a democracy, I presume it to  
11 be true. If it's a totalitarian regime, my  
12 initial thought is that it's false.**

13 Q. I take it then that you presume that  
14 statements from the Israeli Government are true?

15 **A. Israel is a democracy. They are bound  
16 up with our same traditions, rule of law. They  
17 have a system of checks and balances. So, yes.**

18 Q. How would you define the Palestinian  
19 Authority?

20 **A. A totalitarian system.**

21 Q. And I take it from your previous

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1 analysis, you then presume that statements from  
2 the Palestinian Authority are false?

3 **A. My initial presumption is to look at  
4 those statements with skepticism, yes, as I would  
5 any totalitarian regime.**

6 Q. And have you applied those  
7 presumptions to all of the statements you  
8 reviewed in connection with the drafting or  
9 review of your reports?

10 **A. I'm not sure I understand the  
11 question.**

12 Q. The assumptions that you just told us  
13 about Israel and the PA, did you apply those  
14 assumptions --

15 **A. Yes.**

16 MR. YALOWITZ: Let him -- you got to  
17 let him ask the question.

18 Q. Did you apply those assumptions in the  
19 drafting of your rebuttal report?

20 MR. YALOWITZ: Object to the form.  
21 Because it was interrupted, it's disjointed.

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1 Just ask your question again.

2 Q. The presumptions you've just described  
3 about Israeli Government and the PA, did you  
4 apply those assumptions in the drafting of your  
5 rebuttal report?

6 A. Yes.

7 Q. And in your review of the initial  
8 report?

9 A. Yes.

10 Q. Are you aware that questions have been  
11 raised about the authenticity of the documents  
12 seized in Operation Defensive Shield?

13 A. Yes.

14 Q. Have you ever heard of someone named  
15 Jean-Francois Legrain?

16 A. I've heard the name.

17 Q. Have you read the analysis of the  
18 documents?

19 A. His analysis?

20 Q. Yes.

21 A. I'd have to look at it again.

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1 Q. As you sit here today, do you recall  
2 having read it?

3 A. I can't associate his name with that  
4 topic. I'd have to look at the name and the  
5 topic together.

6 Q. When you say you've heard of the  
7 debate regarding the documents' authenticity,  
8 what can you tell me about what you've considered  
9 suggesting that there may be a problem with the  
10 authenticity of the documents?

11 MR. YALOWITZ: Object to the form.

12 A. I'm aware that some people have made  
13 the claim that they're not authentic.

14 Q. And do you know the basis for those  
15 claims?

16 A. I suppose -- well, I don't know, no.  
17 I suppose there's a whole litany of bases for  
18 those complaints.

19 Q. Do you know what that litany is?

20 A. That they were forged.

21 Q. Have you considered those claims in

1 deciding whether to rely on these documents in  
2 forming your opinions?

3 A. I've considered them.

4 Q. And I take it that you've rejected the  
5 suggestions?

6 A. I rejected, yes.

7 Q. And on what basis?

8 A. As I said, our Congress has adopted  
9 them as true in making certain findings of facts  
10 in a bipartisan effort, vote, and we have a lot  
11 of fact finders that are associated with  
12 supplying information to our members of Congress.

13 Also, I give the presumption of  
14 authenticity and validity to the statements of  
15 governments that come from democratic traditions.

16 Q. I'm going to show you what's been  
17 previously marked as Defendants' Exhibit 203.  
18 You recognize that as the document that is cited  
19 in your initial report at Footnotes 8, 9, 10 and  
20 11?

21 A. If I could have a moment to look

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1 through it.

2 Q. Sure.

3 (Witness Reviews Document.)

4 A. This appears to be the document, yes.

5 Q. Who is Dani Naveh, D-A-N-I, capital  
6 N-A-V-E-H?

7 A. I've never met him.

8 Q. Do you know who he is?

9 A. He's the Minister of Parliamentary  
10 Affairs.

11 Q. You say that based on your reading --

12 A. Based on the document itself, yes.

13 Q. In the report that you adopted, this  
14 document is cited four times, correct?

15 (Witness Reviews Document.)

16 A. That appears to be correct.

17 Q. And have you gone through the document  
18 marked as 203 to check the source for the  
19 citations in the report you signed?

20 A. Did I go through the document? Yes.

21 Q. So the first citation --

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1 **A. Okay. Citation Number 8?**

2 Q. Number 8.

3 **A. Okay.**

4 Q. Whereas the report states, "Documents  
5 seized from PA offices by the Israeli military  
6 during Operation Defensive Shield (2002) further  
7 demonstrated that Fatah, the dominant faction of  
8 the Palestinian Authority, bankrolled nearly  
9 every aspect of the AAMB's terrorist  
10 operations-from explosives to guns and gas money.  
11 Footnote 8."

12 What is the source -- what portion of  
13 the document that you have as 203 supports that  
14 contention in your report?

15 **A. It's cumulative. As you see, there's**  
16 **no page number cited. If you look at the**  
17 **document and read it, that's the conclusion that**  
18 **I came to.**

19 Q. When you say that's the conclusion you  
20 came to, you didn't write that sentence, right?

21 **A. Everything in this report I adopt as**

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1 **my own. It reflects my professional opinion. I**  
2 **didn't pen it, but I adopt it as 100 percent**  
3 **reflecting my professional opinion based on these**  
4 **documents and my knowledge of the organization,**  
5 **operation and behavior of terrorist**  
6 **organizations.**

7 Q. And you don't know who penned that  
8 sentence?

9 **A. No, I don't know who did the draft.**

10 Q. It was provided to you by plaintiffs'  
11 counsel, correct?

12 **A. This draft was provided to me. I**  
13 **carefully reviewed it, I made changes and I've**  
14 **adopted it exactly as my own.**

15 Q. And you signed off on it the next day?

16 **A. Well, I don't know -- no, it wasn't**  
17 **the next day, no. I spent some time looking**  
18 **through this document.**

19 Q. Let's go back to Exhibit 239. Do you  
20 still have that in front of you?

21 **A. 239. I don't see it -- oh, yes, I do**

1 **see it. Okay. Yes.**

2 Q. This is the e-mail we discussed before  
3 from Nitsana Darshan-Leitner to you attaching the  
4 two Word documents, correct?

5 **A. Yes.**

6 Q. Dated March 21st, 2013, right?

7 **A. Correct.**

8 Q. And you signed the report on March  
9 22nd, correct?

10 **A. That is correct.**

11 Q. The next sentence on Page 15?

12 **A. The next sentence on Page 15, okay.**

13 Q. That ends with Footnote 9 is a  
14 quotation from the report that is Exhibit 203,  
15 correct?

16 **A. Yes.**

17 Q. What is the unequivocal proof cited in  
18 that sentence?

19 **A. "The captured documents proved**  
20 **unequivocally that the Fatah organization and the**  
21 **Al-Aqsa Martyrs Brigade are one and the same and**

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1 **they cannot be separated."**

2 Q. My question is what is the unequivocal  
3 proof cited in that report?

4 **A. I'm not sure I follow the question.**

5 Q. The sentence that's in quotations  
6 states that, "The captured documents proved  
7 unequivocally that the Fatah organization and the  
8 Al-Aqsa Martyrs Brigade are one and the same and  
9 they cannot be separated," correct?

10 **A. That's what the document states, yes.**

11 Q. Based on your review of the document,  
12 what is the unequivocal proof?

13 **A. You're asking me to find the cite**  
14 **where that came from in the quotation?**

15 Q. No, I'm asking you to tell me in your  
16 words what the unequivocal proof is that Fatah  
17 and Al-Aqsa are one and the same.

18 **A. That's a quotation from the Israeli**  
19 **report.**

20 Q. So the quotation is lifted verbatim  
21 from the Israeli report and dropped into the

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1 report you signed, correct?

2 **A. I think so. I'd have to find the**  
 3 **quote, unless you can help me out and find it for**  
 4 **me. Starts on Page 4. Okay.**

5 Q. Look at Number 5.

6 **A. Okay.**

7 Q. So the first sentence is accurately  
 8 reproduced from Exhibit 203 into Page 15 of the  
 9 report you signed, correct?

10 **A. Yes.**

11 Q. But you can't tell me what the basis  
 12 is for the conclusion that those documents proved  
 13 unequivocally that Fatah and Al-Aqsa are one and  
 14 the same, right?

15 **A. That's the conclusion of this report.**  
 16 **That's one of their conclusions.**

17 Q. But you can't tell me the basis for  
 18 that conclusion?

19 **A. Well, the documents obviously.**

20 Q. Which documents?

21 **A. When you take the wide view and look**

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1 **at all the documents, I think a reasonable person**  
 2 **would come to that conclusion.**

3 Q. Which specific documents cited in this  
 4 report are the basis for your adoption of the  
 5 conclusion that Fatah and Al-Aqsa are one and the  
 6 same?

7 **A. You want me to read the report to you?**

8 Q. No, I'm asking you for the basis for  
 9 your opinion, Professor.

10 **A. This report. These documents indicate**  
 11 **this is a -- this is beyond a smoking gun.**

12 Q. But you can't cite to a single  
 13 individual document?

14 **A. No, but I --**

15 MR. YALOWITZ: Objection.

16 **A. I would join with the congressional**  
 17 **resolutions that have cited the same document,**  
 18 **come to the same factual conclusion.**

19 Q. For this sentence, you would agree  
 20 with me that it is just lifted from one report  
 21 and placed into the report you signed, correct?

1 **A. That's why there's a quotation mark**  
 2 **around it, yes.**

3 Q. Same thing with the next sentence that  
 4 ends with Footnote 10, right?

5 **A. I'd have to find that quote again.**  
 6 **Again, my document's marked up, and obviously I**  
 7 **moved -- when I went through this in March, I**  
 8 **didn't use this clean copy, so if you can point**  
 9 **me to the sentence, I can tell you whether**  
 10 **that --**

11 Q. Well, let me ask you about what you  
 12 did in March. What do you mean you didn't use  
 13 this clean copy? What did you use in March?

14 **A. Well, obviously I got a hold of a copy**  
 15 **and I checked, you know, the citations to ensure**  
 16 **that they, you know, were accurate.**

17 Q. And so your review consisted of making  
 18 sure that what was in the text that you had been  
 19 sent actually appeared in the report that you  
 20 found, right?

21 **A. Yes.**

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1 Q. Look at Page 14.

2 **A. 14 of the?**

3 Q. I'm sorry, of Exhibit 238.

4 **A. 238?**

5 Q. The report you adopted.

6 **A. Oh, the report. Page 14?**

7 Q. Page 14.

8 **A. Okay.**

9 Q. First paragraph, first sentence, you  
 10 write, "During the intifada, Arafat's Fatah  
 11 faction through its Al-Aqsa Martyrs Brigade  
 12 (AAMB) co-opted Islamic symbols and slogans,"  
 13 correct?

14 **A. Yes.**

15 Q. What Islamic symbols and slogans are  
 16 you referring to?

17 **A. Well, from the rhetoric that was**  
 18 **allowed on Palestinian Authority television, they**  
 19 **would adopt the theme of martyrdom and embrace**  
 20 **that concept as a motivation to incite people to**  
 21 **commit murder, and that is a theme that you see**



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<p>1 in radical Islamic extremism, that they adopt</p> <p>2 that theme. And it's not a secular issue,</p> <p>3 obviously. It's a religious issue.</p> <p>4 Q. Other than martyrdom, are you</p> <p>5 referring to anything else?</p> <p>6 A. Well, the word Jihad, of course, is</p> <p>7 also a word that is used by radical Islamic</p> <p>8 extremists, and it motivates people to engage in</p> <p>9 suicide attacks and targeting civilians.</p> <p>10 Q. Which symbols are you referring to?</p> <p>11 A. Well, I guess the symbols are the</p> <p>12 symbolic use of these terms and the gestures and</p> <p>13 mannerisms that people engage in when they incite</p> <p>14 people in the name of radical Islam.</p> <p>15 Q. You didn't write this sentence,</p> <p>16 correct? You didn't pen this sentence?</p> <p>17 A. No, I did not pen that sentence, but I</p> <p>18 adopt it.</p> <p>19 Q. Did you speak to the author who penned</p> <p>20 it?</p> <p>21 A. I don't know who the author was.</p>	<p>1 A. Trying to read the -- so he's got,</p> <p>2 "According to U.S. State Department"?</p> <p>3 Q. Yes. Then the report states, "Fatah's</p> <p>4 AAMB," correct?</p> <p>5 A. Uh-huh. Yes.</p> <p>6 MR. WISE: Can you mark this for me.</p> <p>7 (Defendants' Deposition Exhibit Number</p> <p>8 248 was marked for identification.)</p> <p>9 BY MR. WISE:</p> <p>10 Q. Professor, you're holding Exhibit 248,</p> <p>11 correct?</p> <p>12 A. I am.</p> <p>13 Q. You recognize that as the document</p> <p>14 cited in Footnote 4 on Page 14?</p> <p>15 A. I'm looking at my documents here.</p> <p>16 (Witness Reviews Documents.)</p> <p>17 A. Yes, I see that. Yes, uh-huh.</p> <p>18 Q. That is the document cited?</p> <p>19 A. Yes.</p> <p>20 Q. And if you turn to Page 3, that is</p> <p>21 where the description of the Al-Aqsa Martyrs</p>
Page 119	Page 121
<p>1 Q. Do you know what "Islamic symbols" the</p> <p>2 author of that passage was referring to?</p> <p>3 A. I know what I refer to it as. I refer</p> <p>4 to it as a synonym for the slogans. I mean it's</p> <p>5 another way to say a slogan. A symbol is not</p> <p>6 necessarily something that's on a flag or on an</p> <p>7 emblem, but it involves, you know, all the</p> <p>8 trappings of radical Islam.</p> <p>9 Q. So in your view, symbols and slogans</p> <p>10 are one and the same?</p> <p>11 A. They can be.</p> <p>12 Q. But you didn't speak to the author to</p> <p>13 figure what the distinction was that the author</p> <p>14 was drawing?</p> <p>15 MR. YALOWITZ: Objection.</p> <p>16 A. I didn't know the author.</p> <p>17 Q. The next paragraph, you cite to a 2002</p> <p>18 U.S. State Department report -- or the report</p> <p>19 cites to a 2002 U.S. State Department report as</p> <p>20 support for the proposition that the Al-Aqsa</p> <p>21 Martyrs Brigade was "Fatah's," correct?</p>	<p>1 Brigade appears in that document?</p> <p>2 A. That is correct.</p> <p>3 Q. The actual language of the State</p> <p>4 Department report was that Al-Aqsa, "Consists of</p> <p>5 an unknown number of small cells of terrorists</p> <p>6 associated with the Palestinian Fatah</p> <p>7 organization," correct?</p> <p>8 A. Yes.</p> <p>9 Q. The State Department report cited in</p> <p>10 the report that you signed did not state that the</p> <p>11 Al-Aqsa Martyrs Brigade was part of Fatah,</p> <p>12 correct?</p> <p>13 A. It just says -- it uses the word</p> <p>14 "associated with."</p> <p>15 Q. Didn't use the word "part of,"</p> <p>16 correct?</p> <p>17 A. No, it did not.</p> <p>18 Q. Did not say that Fatah controlled the</p> <p>19 Al-Aqsa Martyrs Brigade, correct?</p> <p>20 A. It didn't use the word "controlled."</p> <p>21 Q. Or that the Al-Aqsa Martyrs Brigade</p>



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1 was Fatah's, right?

2 **A. I don't see that there.**

3 Q. Would you acknowledge that that is a  
4 distinction with a difference relevant to your  
5 analysis?

6 **A. No.**

7 Q. To you, "association with" is the same  
8 as "controlled by?"

9 **A. Can be.**

10 Q. You are associated with St. Mary's  
11 University School of Law, correct?

12 **A. Yes.**

13 Q. Would you describe yourself as  
14 controlled by the school?

15 **A. Can be.**

16 Q. In what way?

17 **A. If the dean tells me I've got a class  
18 at 8, I've got a class at 8.**

19 Q. Okay. When you go out in the public  
20 speaking circuit and speak, are you being  
21 controlled by St. Mary's?

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1 **A. Can be.**

2 Q. You, in fact, almost always start your  
3 speeches with a disclaimer that you are not  
4 speaking on behalf of St. Mary's, correct?

5 **A. That's control. Yeah. They want me  
6 to say that, and that is control. They want me  
7 to make that very clear, so that is an element of  
8 control over my freedom of speech.**

9 Q. Okay. So is it your position now that  
10 your employment with St. Mary's means that they  
11 control you?

12 **A. To a degree, they do.**

13 Q. And did you engage in that type of  
14 analysis as you agreed to what was written in  
15 this report?

16 **A. I think this is an accurate  
17 description. I think there is a direct  
18 association, link that at times is controlling,  
19 certainly under the legal parameters, between  
20 Fatah and the Martyrs Brigade.**

21 Q. And that conclusion is based on this

1 State Department report that's cited, correct?

2 **A. That's one of the sources.**

3 Q. There are no other sources cited for  
4 this sentence, are there?

5 **A. Again, if I had the time -- and again,  
6 this, as you indicated, was researched over a  
7 very quick period of time, as I recall now, when  
8 I got that phone call in the morning. It was a  
9 lot of man hours to send back my comments. So,  
10 yeah -- I mean, it's --**

11 Q. When you say -- I'm sorry.

12 **A. So, yes.**

13 Q. When you say this report was  
14 researched, do you have any knowledge of how the  
15 person who penned that sentence went about  
16 reaching the conclusion contained in it?

17 **A. I don't know the person.**

18 Q. So the answer is no?

19 **A. No.**

20 Q. The report that you signed also cites  
21 to the designation of the Al-Aqsa Martyrs Brigade

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1 as a foreign terrorist in 2002 by the U.S.

2 Department of State, correct?

3 **A. Yes, the U.S. State Department made  
4 that determination in 2002.**

5 Q. Has Fatah ever been designated as a  
6 foreign terrorist organization by the State  
7 Department?

8 **A. No.**

9 Q. What about the Palestinian Authority?

10 **A. Not to my knowledge.**

11 Q. Has the PLO ever been designated as a  
12 foreign terrorist organization by the State  
13 Department?

14 **A. Not in recent memory, not to my  
15 knowledge. There was some discussion several  
16 decades ago, but not now.**

17 Q. And you know that the U.S. Government  
18 allows the PLO to maintain offices in Washington,  
19 D.C. and New York, correct?

20 **A. Correct.**

21 Q. Turning back to 248, the State

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1 Department report, later on in the description of  
2 the Al-Aqsa Martyrs Brigade, the report states,  
3 under the heading External Aid, "In the last  
4 year, numerous public accusations suggest Iran  
5 and Hizballah are providing support to al-Aqsa  
6 elements, but the extent of external influence on  
7 al-Aqsa as a whole is not clear." Do you see  
8 that?

9 **A. Yes, I do.**

10 Q. Do you know what the numerous public  
11 accusations are?

12 **A. Do I know where they got this  
13 information to write this sentence? No.**

14 Q. Did you do any independent research to  
15 verify the validity of any of the sources that  
16 were cited in the initial report?

17 **A. Well, I have a basis of knowledge.  
18 For example, Iran, a lot of basis of knowledge  
19 about Iran's support to Hizballah, Hamas, other  
20 terrorist organizations, so I have a -- you know,  
21 just based on my general scholarship on the**

1 **pull TIME Magazine, you can look at the  
2 resolutions. I don't really have to double-check  
3 whether the resolution is the correct resolution.  
4 So, no.**

5 Q. Do you know whether the Al-Aqsa  
6 Martyrs Brigade was mentioned in the State  
7 Department's 2001 report?

8 **A. I can't recall.**

9 Q. This is an annual report that the  
10 State Department puts out, correct?

11 **A. The State Department puts out an  
12 annual report.**

13 Q. And have you researched the State  
14 Department's subsequent statements about Al-Aqsa  
15 Martyrs Brigade?

16 **A. Well, I have, and I can't recall right  
17 now precisely which year I looked at and what the  
18 language said because I've looked at CSR reports,  
19 I've looked at resolutions, bills.**

20 MR. WISE: Can you mark that for me,  
21 please.

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1 **issue, I've got a wide basis. It's not like the  
2 issue of terrorism law is something that is  
3 foreign to me.**

4 Q. Did you do any independent research to  
5 verify the validity of any of the sources cited  
6 in the initial report you signed?

7 **A. You mean additional independent --**

8 Q. Yeah.

9 **A. Well, yeah.**

10 Q. And what was that?

11 **A. Well, you'll see some of it reflected  
12 in my rebuttal to the Robinson report. I'd have  
13 to get the other report out and go through it  
14 with you, I guess.**

15 Q. Let's talk about just the initial  
16 report. Between when you received the drafts and  
17 when you signed it, did you do any independent  
18 research regarding the validity of the sources  
19 cited in that report?

20 **A. Well, I found that the sources were  
21 all mainstream sources, so, you know, you can**

1 (Defendants' Deposition Exhibit Number  
2 249 was marked for identification.)

3 BY MR. WISE:

4 Q. Professor, that's 249. I'll ask you  
5 if you recognize that as the 2006 version of the  
6 State Department report?

7 **A. It says 2007 at the top.**

8 Q. The date that it is produced, do you  
9 know what that means in relation to what year the  
10 report is covering?

11 **A. My only comment is I don't see where  
12 it says 2006 on here.**

13 Q. Do you know, based on how the State  
14 Department produces its reports, how the date of  
15 publication relates to the time period the State  
16 Department is covering?

17 **A. No.**

18 Q. Will you turn to Chapter 6.

19 **A. Do you know what page that would be  
20 on?**

21 Q. Well, I'm trying to figure out how the

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1 page convention works. The bottom says 2/35.

2 **A. It's going to be near the back, right?**

3 Q. It's about two-thirds of the way  
4 through. And I apologize that I don't have this  
5 better marked.

6 **A. I've got Chapter 6.**

7 Q. Okay. If you're at Chapter 6, then  
8 turn to the second page of Chapter 6, and at the  
9 bottom of the page you'll see a reference to  
10 Al-Aqsa Martyrs Brigade.

11 **A. I see it.**

12 Q. In this report, the State Department  
13 wrote under Description, "The al-Aqsa Martyrs  
14 Brigade" -- strike that.

15 Look at the last sentence of the first  
16 paragraph. It states, "Al Aqsa has no central  
17 leadership; the cells operate with autonomy,  
18 although they remained ideologically loyal to  
19 Palestinian Authority (PA) President and Fatah  
20 party head Yasser Arafat until his death in  
21 2004," correct?

1 the secular-nationalist Fatah movement. Al-Aqsa

2 emerged at the outset of the 2000 Palestinian

3 al-Aqsa Intifada, splitting from the Fatah party

4 to attack Israeli military targets and settlers

5 with the aim of driving Israel from the West Bank

6 and Gaza Strip and establishing a Palestinian

7 state. Al-Aqsa has no central leadership; the

8 sells operate with autonomy, although they

9 remained ideologically loyal to Palestinian

10 Authority (PA) President and Fatah party head

11 Yasser Arafat until his death in 2004," correct?

12 **A. Yes.**

13 Q. Were you familiar with this State  
14 Department report when you adopted your initial  
15 report?

16 **A. I'm familiar --**

17 MR. YALOWITZ: Object to the form.

18 **A. I'm familiar the State Department puts  
19 out an annual report every year. I'm familiar  
20 with the Martyrs Brigade since their creation has  
21 been in that report. As to this specific report,**

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1 **A. I'm sorry, I could not follow where  
2 you were reading.**

3 Q. I'm sorry.

4 **A. I was on the first sentence you  
5 started to read, and I was --**

6 Q. Okay. The third sentence of that  
7 paragraph.

8 **A. What's the title heading of it?**

9 Q. "Description."

10 **A. Okay. Where it says, "Al Aqsa Martyrs  
11 Brigade consists?"**

12 Q. Right, that paragraph.

13 **A. Okay.**

14 Q. Look at the third sentence, which  
15 starts, "Al-Aqsa has no central leadership."

16 **A. It looks like the first sentence under  
17 description is one long sentence. You're under  
18 Activities then.**

19 Q. Let's read the whole description.  
20 "The al-Aqsa Martyrs Brigades consists of  
21 localized cells of Palestinian militias loyal to

1 **I can't recall.**

2 Q. Do you read the State Department  
3 report when it comes out?

4 **A. I generally do, yeah.**

5 Q. But you can't recall whether you were  
6 aware of that specific finding in March of this  
7 year?

8 **A. I know I've read it, but how deeply it  
9 registered, I can't tell you.**

10 Q. A little bit later in this same  
11 report, I believe under the description of  
12 External Aid on the next page, the report states,  
13 "Iran has exploited al-Aqsa's lack of leadership  
14 and funds by providing aid and exerting influence  
15 over the organization," correct?

16 **A. That's what it says.**

17 Q. Do you know what that is a reference  
18 to?

19 **A. Well, it's common knowledge that Iran  
20 provides support to terrorist organizations  
21 around the world. They do it every year. And**

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1 obviously if they see an opportunity to increase  
2 their influence, they will take that opportunity,  
3 as we're seeing today in Syria.

4 Q. And in Syria, they're exerting  
5 influence because of a lack of leadership,  
6 correct, in Syria?

7 A. Well, they're actually supporting the  
8 regime, so I think there is leadership. I  
9 wouldn't say there's a lack of leadership, no.  
10 Assad is still firmly in power.

11 Q. In the State Department report about  
12 Al-Aqsa Martyrs Brigade, when it refers to  
13 exploiting Al-Aqsa's lack of leadership, do you  
14 know what that's a reference to?

15 A. Well, I would assume, as you can see  
16 from this State Department, they don't use the  
17 word "associated" anymore, so they're recognizing  
18 that the Brigade doesn't have the influence it  
19 once had. And so Iran obviously -- whoever wrote  
20 this report is coming to the conclusion that Iran  
21 sees it as an opportunity to increase its

1 2006, 2007?

2 A. Well, it's a general principle.  
3 Iran's a state sponsor of terrorism. They look  
4 for opportunities to exploit the use of  
5 terrorism. And if they perceive that that's an  
6 opportunity for them to have more influence in  
7 the region, then they will take advantage of it.  
8 That's what they've been doing for years, with  
9 not just this Brigade, but with other terrorist  
10 organizations.

11 Q. Later on, on Page 14, the report cites  
12 to a March 21st, 2002 Al-Aqsa Martyrs Brigade, or  
13 AAMB, suicide bomber who "detonated himself in  
14 the middle of a crowded street in Jerusalem,  
15 killing three and injuring 86," correct?

16 A. Yes.

17 Q. Do you know what the basis for that  
18 sentence in the report was?

19 A. Well, the basis for that particular  
20 sentence, I believe the footnote used was from  
21 the Israeli Minister of Foreign Affairs, which I

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1 influence over this terrorist organization.

2 Q. You said that was your assumption,  
3 correct?

4 A. You asked me for my assumption, yeah.

5 Q. I think I asked you for the basis of  
6 your opinion.

7 A. Well, you asked me for the basis of  
8 this guy's opinion. I don't know.

9 Q. You haven't spoken to the author of  
10 the report?

11 A. No. I would agree with it.

12 Q. What would your basis for agreeing  
13 with it be?

14 A. I've been doing this stuff for 13  
15 years --

16 Q. So what is your --

17 A. -- looking at terrorist organizations,  
18 how they operate, how they function, how they  
19 behave, and this is what I would expect to see.

20 Q. And what can you tell us about Iran's  
21 exploitation of the lack of Al-Aqsa leadership in

1 have a copy here.

2 Q. Let me hand you what I'll have marked.

3 A. This was also reported in the  
4 mainstream media, of course.  
5 (Defendants' Deposition Exhibit Number  
6 250 was marked for identification.)

7 BY MR. WISE:

8 Q. That is the document cited in Footnote  
9 6, correct?

10 A. Yes, that's the document cited in  
11 Footnote 6.

12 Q. Do you see a reference in that  
13 document to the March 21st bombing that's  
14 described in the report?

15 A. Well, I see the report. I see the  
16 document.

17 Q. Would you agree there's no reference  
18 in that document to the March 21st?

19 A. That appears to be a mistake in the  
20 footnote.

21 Q. In the highlighted document you have

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1 in front of you, did you catch that mistake in  
2 the footnote when you reviewed these materials  
3 before you signed your report?

4 **A. No, I didn't catch that mistake.**

5 Q. I'm handing you Defendants' Exhibit  
6 210, which was previously marked. You recognize  
7 this as the 2002 State Department Patterns of  
8 Global Terrorism report?

9 **A. Yes, I do.**

10 Q. I'd ask you to turn to Page 85 of this  
11 document.

12 **A. Okay.**

13 Q. Middle of the page, if you'd look at  
14 the date of 21 March?

15 **A. Yes.**

16 Q. The State Department report states,  
17 "In Jerusalem, a suicide bomber detonated the  
18 explosive device he was wearing, killing three  
19 persons and wounding 86 others, including two  
20 U.S. Citizens, according to U.S. Consulate and  
21 media reporting. The Palestinian Islamic Jihad

1 **the suicide attack.**

2 Q. What is, in your view, the  
3 relationship between Palestinian Islamic Jihad  
4 and the Al-Aqsa Martyrs Brigade?

5 **A. I would look at the relationship  
6 between the PA, Palestinian Authority, and Yasser  
7 Arafat in these various organizations.  
8 Organizations are merely groups that have  
9 splintered out that have an association with the  
10 PLO, Yasser Arafat and Fatah.**

11 Q. Palestinian Islamic Jihad is a group,  
12 in your view, that splintered out from the  
13 Palestinian Authority, Fatah and the PLO?

14 **A. They're a group that's associated with  
15 them.**

16 Q. What is the association?

17 **A. Well, again, that question is really  
18 part of a larger question. What is the  
19 association of these terrorist units vis-a-vis  
20 Yasser Arafat, PLO.**

21 Q. Aside from being Palestinian, what

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1 claimed responsibility." Do you see that?

2 **A. I do see that, yes.**

3 Q. Were you aware of the Palestinian  
4 Islamic Jihad's claim of responsibility when you  
5 signed the report on March 23rd?

6 **A. I see this report indicates that that  
7 is their conclusion.**

8 Q. Does seeing that section of the report  
9 cause you to question the accuracy of what is in  
10 the report that you signed?

11 **A. There appears to be a contradiction  
12 between the name of the organization. But, of  
13 course, the Palestinian Islamic Jihad are closely  
14 related as a terrorist group to the Martyrs  
15 Brigade. I mean, that's not an error that's, in  
16 my opinion, that is -- I mean, you've got two  
17 different groups that conducted the attack, if  
18 it's to be taken.**

19 **But in the main, it doesn't alter my  
20 opinion about the responsibility of Fatah, PLO  
21 and Yasser Arafat for whichever group engaged in**

1 else ties the Palestinian Islamic Jihad to the  
2 PLO, PA or Fatah?

3 **A. Well, I would say they are tied  
4 together by the common thread of their goals.**

5 Q. What is the common thread of their  
6 goals?

7 **A. The common thread of their goals  
8 basically is to -- if you look at the charter of  
9 the PLO, it's to regain territories that they  
10 believe belong to them.**

11 Q. And what is the charter of the  
12 Palestinian Islamic Jihad.

13 **A. It's similar.**

14 Q. What is your basis for saying it?

15 **A. I haven't looked at it in quite some  
16 time, but I would imagine this is similar.**

17 Q. But you have looked at it.  
18 (Witness pauses.)

19 **A. I cannot recall specifically, to tell  
20 you the truth. I'm sure that I would have looked  
21 at it.**



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1 Q. Why do you say you're sure you would  
2 have looked at it?

3 **A. I looked at a lot of paper.**

4 Q. Let's go back, and if I repeat, I  
5 apologize. I was inquiring about your basis for  
6 the contention that the Palestinian Islamic Jihad  
7 is associated with the PA, the PLO and Fatah.

8 **A. Yeah, I was just looking at the big  
9 picture, and you have a variety of splinter  
10 groups, some more closely associated with Fatah,  
11 PLO, PA and others.**

12 Q. And is it your view that the  
13 Palestinian Islamic Jihad is closely associated  
14 with the PA, the PLO or Fatah?

15 **A. It's a matter of degree.**

16 Q. Okay. Well, tell me how you would  
17 define the degree to which Palestinian Islamic  
18 Jihad is associated with the PA, PLO and Fatah.

19 **A. I would define it based on the legal  
20 culpability.**

21 Q. And what facts establish that legal

1 **what impact those statements are going to have."**

2 Q. So in your view, that's the  
3 solicitation that the PA has made of Palestinian  
4 Islamic Jihad to commit terrorist attacks?

5 **A. At the minimum level. And then, of  
6 course, you have direct links, where I would draw  
7 a closer tie with the Martyr Brigade.**

8 Q. Tell me about the direct links between  
9 the Palestinian Authority and Palestinian Islamic  
10 Jihad.

11 **A. Well, direct links are hard to  
12 ascertain because that's the very nature. That's  
13 where my expertise falls into, is the framework.  
14 You would expect that the government, the ruling  
15 authority, the PLO, would not claim direct  
16 responsibility. You would not expect to see  
17 that. You would expect them to incite, to use  
18 these groups to do their bidding on the one hand,  
19 while on the other hand holding out the olive  
20 branch of peace, and we're trying to do  
21 everything we can. So you would expect that**

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1 culpability, in your mind?

2 **A. Whether the PLO, Fatah, aka the  
3 Palestinian Authority, have solicited these  
4 organizations, inspired them, directed them,  
5 supported them to engage in acts of terrorism.**

6 Q. So what evidence do you have that the  
7 PA has solicited Palestinian Islamic Jihad to  
8 commit terrorist attacks?

9 **A. Well, as you've seen in the reports,  
10 both of them, we've got numerous statements for  
11 calls to Jihad to the Palestinian people, which  
12 includes these terrorist organizations. That's  
13 just one source.**

14 Q. What else?

15 **A. Well, you would have the Palestinian  
16 Authority control of the media, where they allow  
17 people to get on the media, such as the Grand  
18 Motif of Jerusalem, calling for Jihad, glorifying  
19 martyrdom, and that incites these groups. So you  
20 can't escape responsibility as the leader of the  
21 Palestinian people by saying, "Well, I don't know**

1 **duplicitous to be evident, particularly in times of  
2 violence.**

3 Q. Can you point to a single specific  
4 event that, according to you, shows that the  
5 Palestinian authority was soliciting Palestinian  
6 Islamic Jihad to commit a terrorist attack?

7 **A. Yes.**

8 Q. Please do.

9 **A. It's in my report.**

10 Q. Identify it for me.

11 **A. I can read it for you. These would be  
12 the statements that are made, they're allowed to  
13 be made on the Palestinian media networks --**

14 Q. Do any of those statements reference  
15 Palestinian Islamic Jihad specifically?

16 **A. They do not reference any terrorist  
17 organization specifically, and that's the beauty  
18 of it. That's what they do. Therefore, they can  
19 have it both ways. This is what you would expect  
20 to see.**

21 Q. The other incident on Page 14 is an

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1 incident that -- I'll wrap up this question --  
 2 cites to Footnote 6. The sentence says, "Less  
 3 than" --

4 **A. I'm sorry. Let me go back to it.**  
 5 **Page 14?**

6 Q. Page 14.

7 **A. Yes.**

8 Q. "Less than three weeks earlier,  
 9 another Al-Aqsa Martyrs Brigade suicide bomber  
 10 had killed 10 and injured 50 at a bar mitzvah  
 11 celebration, Footnote 6."

12 **A. That's correct.**

13 Q. That's the article that we looked at  
 14 earlier that is Number 250, correct?

15 **A. Right.**

16 Q. Other than that news report, is there  
 17 any other source for the tie of Al-Aqsa Martyrs  
 18 Brigade to that incident?

19 **A. Well, this is a Reuters report, I**  
 20 **believe, but I'm sure that if you Googled this**  
 21 **incident, you would have numerous mainstream**

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1 **media newspapers that reported that same**  
 2 **incident.**

3 Q. You believe 250 is a Reuters report?

4 **A. Well, I'm reading down here at the**  
 5 **bottom. It says, "2002 Reuters/Cohen Magen.**  
 6 **Members of funeral service search a baby carriage**  
 7 **for body parts at scene of suicide bombing."**

8 **So as you know -- you may not know,**  
 9 **but many of these news reports get feeders from,**  
 10 **you know, from different news services, and then**  
 11 **they provide that to different newspapers who**  
 12 **pick up the story, but the origin --**

13 Q. Look at 250 with me, the one I handed  
 14 you, that's marked in front of you.

15 **A. 250, okay.**

16 Q. Is that the same document that you  
 17 have in your notebook?

18 **A. It appears that your document is**  
 19 **missing some information.**

20 Q. What information is my document  
 21 missing?

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1 **A. The caption is cut off, the one I just**  
 2 **read, where it says, "Members of funeral service**  
 3 **search a baby carriage for body parts at scene of**  
 4 **suicide bombing," it appears to be in the same**  
 5 **type and font as, "2002 Reuters/Gil Cohen Magen."**

6 MR. YALOWITZ: If you won't object, we  
 7 can point the witness to the second page. I  
 8 think we just have a pagination issue.

9 MR. WISE: That's fine.

10 Q. Yeah, look at the second page.

11 **A. Oh, okay. So there it is. That's**  
 12 **comforting.**

13 Q. Turn back to the front page.

14 **A. Yes.**

15 Q. The header on the front page of the  
 16 document says, "Israel Ministry of Foreign  
 17 Affairs," correct?

18 **A. Yes.**

19 Q. What is the Israel Ministry of Foreign  
 20 Affairs?

21 **A. It's the Israel Minister of Foreign**

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1 **Affairs.**

2 Q. What does it do?

3 **A. I assume that the Ministry does what**  
 4 **it says it does. It conducts foreign affairs for**  
 5 **the State of Israel.**

6 Q. Other than assuming based on its name,  
 7 do you know what the Ministry of Foreign Affairs  
 8 does?

9 **A. I've never worked there. I don't.**

10 **No. I don't know.**

11 **(Brief Recess.)**

12 **BY MR. WISE:**

13 Q. So before we go back into your report,  
 14 let me just ask you a couple of things. First of  
 15 all, during the breaks, have you been speaking  
 16 with anybody about the substance of your  
 17 testimony?

18 **A. No.**

19 Q. Earlier you described something that  
 20 you called the discipline of terrorism law?

21 **A. Yes.**

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1 Q. First of all, that's a discipline that  
2 you, yourself, have created, right?

3 A. I helped create it.

4 Q. Can you describe to me the process of  
5 creating it?

6 A. Well, I'll go back to the beginning.

7 Congress passed a law in the 1980s that said that  
8 every special forces group had to have an  
9 attorney assigned to it, and I was a new JAG  
10 officer captain, and I volunteered for that  
11 position, so I was assigned to the first special  
12 forces group. We had never had JAG lawyers that  
13 accompanied soldiers in the field before. In  
14 Vietnam, we had a couple of extraordinary cases  
15 where that occurred, but the new discipline  
16 required that the JAG officers would accompany  
17 combat forces into the field, and so I went  
18 through the training and did that for a special  
19 forces group out of Ft. Lewis, directed towards  
20 Asia.

21 Based on that experience, because it

1 out in about a year and a half, based on my  
2 experiences with terrorism organizations in Peru,  
3 which I have a lot of experience with that.

4 So from there, I think we've already  
5 covered that part of my career, in 2000 I go to  
6 the law faculty of St. Mary's. After 9/11, I  
7 went to the dean and proposed that we create a  
8 Center to look at all the legal issues associated  
9 with terrorism, and "The War on Terror." The  
10 dean agreed, and we had Senator John Cornyn come  
11 and cut the ribbon to our Center in 2003.

12 I coined the phrase "terrorism law," I  
13 guess probably right after 9/11, and today, if  
14 you Google the term "terrorism law," thousands of  
15 things will pop up, all the way from the ABA  
16 recognizing that as a legal discipline, to, you  
17 know, institutes, organizations all over the  
18 place. But it's a subset of national security  
19 law. It deals with state-sponsored terrorism,  
20 state-supported terrorism, substate terrorism,  
21 lone wolf terrorism, looks at how these things

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1 was so new, they recruited me to go back to the  
2 JAG School to teach, and that's where I started  
3 teaching operational law, which was recognized as  
4 a new discipline, and part of that was dealing  
5 with, not just conventional warfare, but  
6 asymmetrical warfare and terrorism and those  
7 types of issues because of the experiences we had  
8 had in the '80s, of course, with Libya and other  
9 terrorist organizations and the bombing of the  
10 Twin Towers in 1993, which, of course, was later,  
11 but that kind of drove the discipline.

12 I picked up an extra degree from the  
13 grandfather of national security laws, John  
14 Norton Moore, the University of Virginia Law  
15 School. You're familiar with him. He's really  
16 credited for starting this discipline, national  
17 security law, at the American Bar Association. I  
18 was on the ground for all of that. I got my  
19 master's of law from UVA at that time.

20 When I went to the Pentagon, I got my  
21 doctorate of political science, which I knocked

1 develop, how they're used as a tool, a policy  
2 tool, political tool, an ideological tool, and so  
3 that's what our Center does.

4 But it's an interdisciplinary  
5 discipline that looks at the framework, the  
6 creation, the behavior of governments and  
7 organizations that use terrorism as a tool.

8 Q. The discipline of terrorism law itself  
9 started with your institute at St. Mary's; is  
10 that fair to say?

11 A. We're the only law school in the  
12 country that has an institute that's devoted to  
13 the study of terrorism law. That's correct.

14 Q. How many other law schools in the U.S.  
15 Teach a course on terrorism law?

16 A. Well, I know -- I have, obviously,  
17 relations with other law professors and law  
18 schools across the country. I know that  
19 University of Virginia has a national security  
20 course that they teach, and part of that course  
21 deals with the issue of terrorism.

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1 I know that Duke in North Carolina,  
2 under a fellow by the name of Silliman has an  
3 institute that teaches terrorism.

4 Most law schools do not teach courses  
5 in national security or terrorism. I teach a  
6 course on terrorism law and national security  
7 law. So there are other law schools that do  
8 that, but the majority of them do not.

9 Q. Do you have a printed syllabus for  
10 your course on terrorism law?

11 A. Yes, I do.

12 Q. And does that course include a section  
13 on the Palestinian Authority?

14 A. No.

15 Q. Or Fatah?

16 A. No.

17 Q. Or the Second Intifada?

18 A. No.

19 Q. Let's go back to Page 14 of Exhibit  
20 238, specifically the sentence that begins on the  
21 end of 14 and then continues onto 15.

1 the article?

2 A. It would be -- well, according to the  
3 article? I'll have to read the article here.

4 Q. Let me ask you this: Did you ever  
5 speak with the author of this article?

6 A. Matthew Kalman?

7 Q. Yes.

8 A. I don't recall.

9 Q. Do you know who he is?

10 A. The name sounds familiar.

11 Q. Any recollection of speaking with him  
12 about this particular article?

13 A. No, not this article.

14 Q. Okay. If you'll look at the first  
15 paragraph leading down to the quote that's cited  
16 in the report, do you see that the speaker is  
17 identified, by the article, at least, as Maslama,  
18 M-A-S-L-A-M-A, Thabet, T-H-A-B-E-T?

19 A. I see that name on the USA Today  
20 article.

21 Q. Other than seeing the name in the USA

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1 A. I'll look at your original document  
2 here.

3 Q. 238 is your report.

4 A. Page 14?

5 Q. Yes. Starts on the bottom of 14 and  
6 then continues to Page 15.

7 A. Okay.

8 Q. It says, "Indeed, one commander in  
9 Tulkarem acknowledged, 'We receive our  
10 instructions from Fatah. Our commander is Yasser  
11 Arafat himself.' Footnote 7." Do you see that?

12 A. Uh-huh, yes.

13 Q. I'm going to show you what's been  
14 previously marked as Defendants' Exhibit 184 and  
15 ask you if you recognize that as the document  
16 cited in Footnote 7?

17 A. Yes.

18 Q. You see the quote that's in the report  
19 in this article?

20 A. Yes.

21 Q. And who is the speaker, according to

1 Today article, do you know who Maslama Thabet is?

2 A. I've never met him.

3 Q. Have you ever spoken with anyone about  
4 him?

5 A. Have I spoken with anyone about him?

6 Q. Yes.

7 A. No.

8 Q. Do you know whether he is, in fact, a  
9 "Commander with the Al-Aqsa Martyrs Brigade"?

10 A. I know what's in the article in  
11 regards to this gentleman.

12 Q. Other than what's in the article about  
13 Maslama Thabet?

14 A. No.

15 Q. Do you see the paragraph, second full  
16 paragraph from the end?

17 A. From the end of the article?

18 Q. No, from the end of the first page.

19 A. Okay. Second full paragraph. Oh,  
20 yes.

21 Q. Paragraph starts with, "Spokesmen for

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1 Arafat." See that?

2 A. Yes.

3 Q. The second sentence, do you know who  
4 Nabil Abu Rudeineh is?

5 A. Well, the article says he's Arafat's  
6 chief spokesman.

7 Q. Do you have any reason to believe that  
8 is not the case?

9 A. No.

10 Q. Other than what is reported in the  
11 article, do you have any other knowledge of Mr.  
12 Rudeineh?

13 A. No.

14 Q. Do you see where the article quotes  
15 Mr. Rudeineh, saying he's never heard of Thabet?

16 A. Yes.

17 Q. That is not included in the report you  
18 signed, correct?

19 A. No.

20 Q. Are you familiar with a group called  
21 Human Rights Watch?

1 The Shining Path. This was a Marxist terrorist

2 organization founded by a university professor in

3 Ayacucho that was trying to overthrow the

4 Peruvian Government. And Human Rights Watch, in

5 my opinion, was very disingenuous in how they

6 covered the human rights issues in Peru in the

7 1990s.

8 Q. Any experiences with Human Rights

9 Watch in relation to Israel or Palestine or --

10 A. Personally, no.

11 Q. -- events in the Second Intifada?

12 A. No, sir.

13 Q. I'm going to show you what has

14 previously been marked as Defendants' Exhibit

15 185. Do you recognize what that is?

16 A. That appears to be the Human Rights  
17 Watch report.

18 Q. Have you ever seen this document  
19 before?

20 A. I've seen references to the document  
21 before, yes.

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1 A. Oh, yes.

2 Q. What is that?

3 A. It's NGO.

4 Q. Just for the record, what does NGO  
5 stand for?

6 A. Non-Governmental Organization.

7 Q. And what does Human Rights Watch do?

8 A. Well, they produce opinions about the  
9 compliance of various nations in regards to human  
10 rights.

11 Q. Do you view Human Rights Watch as a  
12 reputable organization?

13 A. I view them as an NGO. I've had some  
14 experiences with them that would cause me to  
15 question their methodology.

16 Q. Can you describe those experiences for  
17 me?

18 A. Well, as I indicated, I had a great  
19 deal of experience in Peru in the 1990s

20 associated with Sendero Luminoso, S-E-N-D-E-R-O,  
21 Luminoso, L-U-M-I-N-O-S-O, which in English is

1 Q. Where?

2 A. I believe it's in the Robinson report.  
3 I'm going to have to check my notes.

4 Q. As a result of those references, have  
5 you reviewed this report?

6 A. I haven't read the report, no.

7 Q. Have you read the sections that  
8 Robinson cites in his report?

9 A. No, I didn't read all of his  
10 footnotes.

11 Q. Turn, if you would, to -- actually,  
12 let's start with the back side of the third page,  
13 and you will see something called, "About This  
14 Report."

15 A. The back side of the third page. I'm  
16 not finding it. Is it after the Table of  
17 Contents?

18 Q. No, right before the Table of  
19 Contents.

20 A. Oh, yes, I see it.

21 Q. The first paragraph of the About This



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1 Report section states, "This report is based on  
2 field research, expert and witness interviews,  
3 and examination of public documents. Field  
4 research was carried out during two Human Rights  
5 Watch investigative missions to Israel, the West  
6 Bank, and the Gaza Strip in May-June 2002.  
7 During these visits, Human Rights Watch  
8 interviewed members of armed groups, victims,  
9 families of perpetrators, PA officials, current  
10 and former PA security officers, Israeli and  
11 Palestinian analysts and security experts,  
12 diplomats and other foreign officials, and  
13 Palestinian activists and militants."

14 Assuming that statement of methodology  
15 is correct, is this the type of report that you  
16 would rely on in forming your opinions about the  
17 subject matters you have opined on in this case?

18 **A. I would consider them a secondary**  
19 **source at best.**

20 Q. Why at best?

21 **A. As I said, I've had personal**

1 specifically to the Footnote 217, which reads,  
2 "Israel has made public a February 2002 memo  
3 ("memo to Tirawi") from the head of the PA's  
4 General Intelligence Services (GIS) in Tulkarem,  
5 which refers to Maslama Thabet as 'an outcast'  
6 among the al-Aqsa Brigades fighters there. (The  
7 "memo to Tirawi" is analyzed in detail in Section  
8 7, below.)"

9 Do you know who Tirawi is?

10 **A. No, I don't.**

11 Q. Do you know what the circumstances of  
12 Israel making public this memo?

13 **A. I am not familiar with that memo.**

14 Q. Does the citation to the memo and its  
15 reference to Maslama Thabet affect your reliance  
16 or your evaluation of the quote in the USA Today  
17 article?

18 **A. As I said, I would give more weight to**  
19 **the USA Today article than the Human Rights Watch**  
20 **report, just based on my personal experiences**  
21 **with Human Rights Watch.**

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1 **experiences with Human Rights Watch that I know**  
2 **to be false.**

3 Q. Would you consider a source like Human  
4 Rights Watch to be more, less than, or similarly  
5 credible as Israeli Government reports?

6 **A. No. I'd consider the Israeli**  
7 **Government reports to be far superior.**

8 Q. What about accounts in newspaper  
9 articles?

10 **A. Superior.**

11 Q. Why?

12 **A. I view them as more fair and balanced**  
13 **than Human Rights Watch. My opinion, Human**  
14 **Rights Watch has an agenda.**

15 Q. And that's based on your experience  
16 with them in Peru, correct?

17 **A. Based on my experience with them over**  
18 **several years associated with the terrorist**  
19 **activities in Peru.**

20 Q. Go with me, if you would, to Page 81  
21 of this report. I'll call your attention

1 Q. Okay. So you don't know the  
2 circumstances of the writing of the memo  
3 referenced, correct?

4 **A. I have not seen the memo.**

5 Q. You don't know the circumstances of  
6 Israel's release of the memo, correct?

7 **A. Correct.**

8 Q. You previously said that when the  
9 Israeli Government makes statements, you credit  
10 them because they come from the Israeli  
11 Government, right?

12 **A. That's correct.**

13 Q. Do you distinguish between statements  
14 made and documents released?

15 **A. No, I would give them weight, as I**  
16 **indicated, but I don't know in this -- I haven't**  
17 **seen the memo. I don't -- obviously Human Rights**  
18 **Watch is interpreting this memo in a way that**  
19 **they want to interpret the memo. I'd have to**  
20 **read the memo so I can make up my own assessment.**

21 Q. Do you know whether this memo was

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1 cited in the Robinson report?

2 **A. I'd have to look at his report. I**  
 3 **seem to think it might have been. I'd have to**  
 4 **look at it again.**

5 Q. But you didn't make any effort to  
 6 locate this memo itself to review it  
 7 independently?

8 **A. No.**

9 Q. Page 13 of your initial report, in the  
 10 paragraph that starts at the bottom and finishes  
 11 on Page 14, your report cites to a piece by  
 12 Matthew Levitt, correct?

13 **A. The paragraph where it says, "In his**  
 14 **attempt"?**

15 Q. Yes.

16 **A. And you're talking of Footnote 3?**

17 Q. Yes.

18 **A. Yes.**

19 Q. So in this paragraph, your report  
 20 alleges that, "Arafat began to wield Islamic  
 21 rhetoric similar to that of Hamas." Correct?

1 **not a new theme.**

2 MR. WISE: I'm going to show you --  
 3 I'm going to hand you what's 251.

4 (Defendants' Deposition Exhibit Number  
 5 251 was marked for identification.)

6 BY MR. WISE:

7 Q. Do you recognize Exhibit 251 as the  
 8 document cited in Footnote 3?

9 MR. YALOWITZ: I'm sorry, my copy only  
 10 has what looks like one page out of --

11 MR. WISE: Yeah, that will be my next  
 12 question.

13 **A. Okay. So let me -- we're looking at**  
 14 **Footnote 3?**

15 Q. Looking at Footnote 3.

16 **A. Okay.**

17 Q. So my first question is this: What  
 18 I've handed you as 251 is what we've received  
 19 from the plaintiffs' counsel related to this  
 20 exhibit. Have you reviewed Mr. Levitt's entire  
 21 piece?

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1 **A. Yes, that's what it says.**

2 Q. "He made Jerusalem, perhaps the lowest  
 3 common denominator among Palestinians, a focal  
 4 point of the violence." Correct?

5 **A. That's what I believe.**

6 Q. What do you mean by "lowest common  
 7 denominator"?

8 **A. Well, it's the one issue that he felt**  
 9 **would unite individuals. It's a religious issue.**  
 10 **As I indicated before, that's what -- when they**  
 11 **incorporate these slogans and symbols, Jerusalem**  
 12 **is a symbol, if you will, not a slogan. There**  
 13 **are several holy places there related to Islam,**  
 14 **so that's the symbol.**

15 Q. Any other basis for the opinion that  
 16 it's the lowest common denominator among  
 17 Palestinians?

18 **A. Well, the basis would be the rhetoric**  
 19 **that's put out by a variety of individuals about**  
 20 **their attachment to Jerusalem as being something**  
 21 **that would be associated with martyrdom. This is**

1 **A. I don't have it in front of me here.**  
 2 **I reviewed this back in my office.**

3 Q. You think you reviewed the entire  
 4 piece?

5 **A. Well, I can't recall right now, no.**  
 6 **When I can't recall, I'm not saying no. I just**  
 7 **can't recall.**

8 Q. If you look at the end of the first  
 9 full paragraph on the second page of the exhibit  
 10 I've handed you, you see the quotation, "We are  
 11 marching, million of martyrs to Jerusalem"?

12 **A. Yes.**

13 Q. And that is the quote that is included  
 14 in the report you signed, right?

15 **A. That's the one in my report, yes.**

16 Q. A conclusion in your report, based on  
 17 that quotation, is that Arafat was wielding  
 18 Islamic rhetoric similar to that of Hamas,  
 19 correct?

20 **A. Well, yes, that's my conclusion. It's**  
 21 **the same they're -- he's using the symbols and**

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1 the rhetoric of Jihad.

2 Q. And are you referring to the use of  
3 the word "martyr" their?

4 A. Yes.

5 Q. Okay. What is your definition of the  
6 word "martyr"?

7 A. Well, a martyr is someone that dies in  
8 Jihad.

9 Q. And what is Jihad?

10 A. In this context, it would be to engage  
11 in violence, unlawful violence, of course, that's  
12 what terrorism is, against other individuals.  
13 They're apostate or they categorize them, of  
14 course, as infidels.

15 Q. So a martyr is one who engages in  
16 unlawful violence against others, correct?

17 A. Well, you kill yourself. I mean,  
18 that's part of the ingredient. You martyr  
19 yourself. You kill yourself for the cause.

20 Q. Is there any other definition of  
21 martyr that you know of that would not involve

1 you've included in your report.

2 A. Right.

3 Q. There's no question in your mind that  
4 here, Arafat is using "martyr" to describe  
5 someone involved in unlawful violence, correct?

6 A. Yes.

7 Q. The quotes attributed to Arafat on  
8 this page of Mr. Levitt's piece are translated by  
9 the Middle East Media Research Institute,  
10 correct?

11 A. Yes.

12 Q. Have you ever heard of the acronym  
13 MEMRI?

14 A. I believe that was standing for the  
15 Institute.

16 Q. Have you heard that acronym used?

17 A. I'm sure I have. I don't recall.

18 Q. Do you know what MEMRI is?

19 A. I would assume it stands for the  
20 institute you just described, Middle East Media  
21 Research Institute.

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1 acts of violence?

2 A. From the context of the rhetoric that  
3 was employed by Arafat, I would say no, that's  
4 exactly what he was intending to be the response.

5 Q. In all of your other work, has there  
6 ever been the term "martyr" used that didn't have  
7 a connotation of unlawful violence?

8 A. I suppose it can.

9 Q. Can you give me an example?

10 A. Well, in the English language you  
11 would say that, you know, you've martyred  
12 yourself by doing the dishes. It just shows that  
13 you're doing something as a sacrifice or as  
14 something that you want people to recognize what  
15 you're doing.

16 Q. Did Arafat ever use the term "martyr,"  
17 in your view, in a way that did not connote an  
18 act of violence by the person called a martyr?

19 A. I've never met Yasser Arafat. I can't  
20 say never, no. I don't know.

21 Q. Let's turn back to this instance that

1 Q. Do you know what that institute does?

2 A. I've never visited the institute.

3 Q. I take it you do not, yourself, speak  
4 Arabic?

5 A. No, I don't.

6 Q. And other than what you see on this  
7 page, do you have any other knowledge regarding  
8 this speech by Mr. Arafat?

9 A. I know that the speech has been quoted  
10 in other articles, but no. Other than that, no.

11 Q. The middle of this page includes the  
12 sentence in the middle.

13 A. In the middle, okay.

14 Q. "Arafat continued:" -- you see where I  
15 am?

16 A. Yes, I sure do.

17 Q. "Arafat continued: 'The martyr  
18 Muhammad al-Dura [a twelve-year-old boy killed in  
19 cross-fire between Israeli and Palestinian  
20 forces] says to [the Jews] from paradise, and all  
21 of our martyrs tell them: We are the nation of

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1 heroes.'" Do you see that?

2 **A. Uh-huh.**

3 Q. First of all, the brackets were added  
4 by MEMRI, correct?

5 **A. They're added by someone.**

6 Q. You don't know who, though?

7 **A. No.**

8 Q. Based on the quotation that you see  
9 there, you'd agree with me that Arafat was  
10 referring to Muhammad al-Dura as a martyr,  
11 correct?

12 **A. Yes.**

13 Q. Who is Muhammad al-Dura?

14 **A. According to the bracket, he is a**  
15 **12-year-old boy killed in cross-fire and, of**  
16 **course, this story was reported, as I recall,**  
17 **years ago. He was a symbol that was used to**  
18 **incite other individuals, as this indicates here.**

19 Q. He was used to incite other  
20 individuals?

21 **A. My opinion, yes.**

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1 Q. He was a 12-year-old boy, right?

2 **A. Right.**

3 Q. Killed in cross-fire?

4 **A. Yes.**

5 Q. No indication that Muhammad al-Dura  
6 blew himself up, right?

7 **A. No.**

8 Q. Or committed an act of violence,  
9 correct?

10 **A. No.**

11 Q. And Yasser Arafat refers to him in  
12 this quote as a martyr, right?

13 **A. Correct. As I said, he was used.**

14 Q. So this is an instance, you'd agree  
15 with me, where Arafat used the term "martyr" to  
16 describe someone who was not himself committing  
17 acts of violence, right?

18 **A. He used the boy to incite others to**  
19 **commit acts of violence.**

20 Q. And that's why Arafat was calling him  
21 a martyr, in your opinion?

1 **A. Oh, yeah.**

2 Q. Because he knew he was going to use  
3 the boy to incite acts of violence by others?

4 **A. Absolutely.**

5 Q. What's your basis for that opinion?

6 **A. The statement itself.**

7 Q. Tell me what part of the statement  
8 supports that conclusion.

9 **A. Common sense.**

10 Q. What part of common sense?

11 **A. The common sense part of common sense.**

12 Q. Describe for me what common sense part  
13 of common sense leads you to draw that opinion.

14 **A. Well, it's not just this one**  
15 **statement. You're looking at other statements**  
16 **that people associated with Arafat have made, as**  
17 **I've covered in my report. You're looking at**  
18 **other statements that Arafat has made about his**  
19 **desire to be a martyr, you know, to die for the**  
20 **cause, so this is not just one statement. You**  
21 **look at the entire picture, and then common sense**

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1 **will tell you this is exactly what he's trying to**  
2 **do.**

3 Q. Which is what in relation to this  
4 12-year-old boy?

5 **A. Incite the crowd and individuals**  
6 **within the crowd or others to engage in**  
7 **martyrdom, terrorist activities.**

8 Q. That's the conclusion you draw from  
9 that sentence?

10 **A. That sentence, plus the context, plus**  
11 **all the other evidence that you put together.**  
12 **That's what Arafat would do. He would use**  
13 **people, use situations to his own advantage.**

14 Q. Are you suggesting that he sent this  
15 12-year-old boy out to be killed so he could then  
16 incite violence?

17 **A. This particular case? I do not know.**  
18 **I do know that the PA, the PLO had training camps**  
19 **for children, which our Congress also found as a**  
20 **finding of fact, teaching them to engage in**  
21 **violence.**

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1 Q. What's your basis for saying that the  
2 PA had these camps?

3 A. **Well, we can pull up the congressional  
4 resolution.**

5 Q. Is there anything more than the  
6 congressional resolution?

7 A. **That's enough for me, but I'm sure  
8 there's -- you know, obviously there's other  
9 media reports. We can do the research and dig  
10 that up pretty easily if we wanted to.**

11 Q. Have you seen the other media reports?

12 A. **Have I seen other media reports? I've  
13 seen other media reports on that issue, yes.**

14 Q. Did you cite them in your report?

15 A. **No. I cited the best source.**

16 Q. Your report describes the crowd as  
17 "frenzied" at the top of Page 14, right?

18 A. **Yep.**

19 Q. What's the basis for that opinion?

20 A. **Oh, my opinion?**

21 Q. Yes.

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1 A. **I thought you were talking about the  
2 paper, so let me look at the top of Page 14.**

3 **Yeah. Well, I've attended many and  
4 I've viewed many rallies of this sort, and these  
5 crowds get very emotional. They get very  
6 frenzied.**

7 Q. Have you viewed any video of this  
8 rally?

9 A. **This particular crowd, no.**

10 Q. So you have no basis to adopt the word  
11 "frenzied"?

12 A. **I do have a basis.**

13 Q. What's your basis?

14 A. **My experience.**

15 Q. But not related to this individual  
16 event?

17 A. **I wasn't at this event.**

18 Q. And have never seen any video of it?

19 A. **Not this particular event.**

20 Q. On Page 16 of the report, you state  
21 that Arafat, first full paragraph -- I'm sorry,

1 I'm on Page 16 of your report.

2 A. **Okay. Page 16. I'm with you.**

3 Q. Page 16, you write, "Arafat personally  
4 praised numerous attacks, including the 2001  
5 Dolphinarium discotheque bombing in Tel Aviv,  
6 which killed a large number of Israeli youths.  
7 According to Arafat, the attack was a 'heroic  
8 martyrdom operation'." See that quote in the  
9 report?

10 A. **I sure do.**

11 Q. Okay. And you cite to another MEMRI  
12 dispatch?

13 A. **Yes.**

14 Q. Have you reviewed that dispatch?

15 A. **Yes.**

16 MR. WISE: Mark this as 252.

17 (Defendants' Deposition Exhibit Number  
18 252 was marked for identification.)

19 BY MR. WISE:

20 Q. You recognize 252 as the document  
21 cited?

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1 A. **That is the one.**

2 Q. And this is the MEMRI report?

3 A. **It is.**

4 Q. And you said that you read this,  
5 correct?

6 A. **I did.**

7 Q. MEMRI is reporting on a German  
8 television program, correct?

9 A. **Yes.**

10 Q. Did you view the original source, the  
11 television program?

12 A. **No.**

13 Q. Any idea whether MEMRI reported it  
14 correctly?

15 A. **I assume they did.**

16 Q. What's the basis for that assumption?

17 A. **It fits the pattern of what Arafat  
18 does.**

19 Q. Did you see the letter yourself that's  
20 referenced?

21 A. **I see the MEMRI report. My German is**



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1 **not too good. I haven't seen the German TV, as I**  
 2 **said, or the letter.**

3 Q. So this is not a document that you've  
 4 viewed an independent translation of, correct?

5 **A. No.**

6 Q. The MEMRI report, you see a footnote  
 7 on the second page that says, "The PA daily  
 8 Al-Ayyam, reported on June 24, '01 that on June  
 9 23rd, 2001 Yasser Arafat's bureau in Ramallah  
 10 denied the claims of the German TV station  
 11 according to which they have a letter by Arafat  
 12 praising the martyrdom operation that caused the  
 13 death of 21 Israel youth. Arafat's bureau said  
 14 that the letter is a forgery." You see that in a  
 15 footnote?

16 **A. I see that.**

17 Q. Do you consider the footnote in  
 18 deciding whether or not to sign on to your  
 19 report?

20 **A. Yes.**

21 Q. It's not mentioned in the report, the

1 Q. So when he says things that are  
 2 ambiguous, you infer that he is inciting  
 3 violence, right?

4 **A. It depends on the context. I'd have**  
 5 **to look at the context. Give me a specific**  
 6 **example. I mean, he says a lot of things.**

7 Q. Well, let's use the last example, the  
 8 12-year-old boy who he called a martyr. In your  
 9 view, that was an incitement to violence?

10 **A. Yes.**

11 Q. And when he denies the truth of  
 12 things, you discredit that as untrue?

13 **A. Yes. I give it less weight. I mean,**  
 14 **I give it less weight, far less weight, because**  
 15 **that's the modus operandi of a totalitarian ruler**  
 16 **that engages in terrorism. That's what they do.**

17 Q. It's not mentioned anywhere in your  
 18 report that this was denied, correct?

19 **A. No, I have not -- well, no.**

20 Q. Take a look at Page 13 of your report.

21 **A. Sure.**

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1 denial, correct?

2 **A. No. I would expect him to deny it.**

3 Q. Why is that?

4 **A. Again, based on the discipline that**  
 5 **I've been involved in, terrorism law, that's what**  
 6 **groups, governments, organizations that engage in**  
 7 **terrorism do. They don't take responsibility**  
 8 **directly. They use people. They use**  
 9 **organizations to carry out their bidding. And**  
 10 **when they are confronted with it, they deny all**  
 11 **responsibility.**

12 Q. I thought you had told us before that  
 13 Arafat would often incite the public through  
 14 public statements calling for acts of violence?

15 **A. He would, but he would craft it in a**  
 16 **way that -- as we indicated in the last**  
 17 **discussion about his speech in Jerusalem, he**  
 18 **would craft it in a way to incite but not**  
 19 **directly tell people, "Put your suicide vest on,**  
 20 **go out and blow up things." He's not that**  
 21 **stupid.**

1 Q. You claim on Page 13 -- on Page 13,  
 2 you cite to a media report quoting Suha Arafat,  
 3 correct?

4 **A. Yes, yes.**

5 Q. Okay. And that is Yasser Arafat's  
 6 widow?

7 **A. Yes.**

8 Q. And the report states that Yasser  
 9 Arafat's widow, "Admitted that Arafat had planned  
 10 the intifada," correct?

11 **A. Correct.**

12 Q. Citing to a Jerusalem Post article  
 13 from 2012, right?

14 **A. Yes.**

15 **(Defendants' Deposition Exhibit Number**  
 16 **253 was marked for identification.)**

17 **BY MR. WISE:**

18 Q. You recognize that as the article  
 19 cited in Footnote 2?

20 **A. Yes, it is.**

21 Q. The article was written in 2012,

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1 correct?

2 **A. Yes.**

3 Q. And quoted an interview with Dubai  
4 Television, correct?

5 **A. Correct.**

6 Q. Again, translated by MEMRI, according  
7 to the first paragraph of the article?

8 **A. Yes.**

9 Q. Have you viewed the interview or the  
10 television broadcast?

11 **A. I have not.**

12 Q. According to the article, Suha Arafat  
13 claimed that her husband said he did not want to  
14 be seen as "abandoning the Palestinian cause and  
15 principles," correct?

16 **A. Yes.**

17 Q. Did you consider whether Suha Arafat  
18 had any motive to falsely recount what her  
19 husband said to her?

20 **A. No.**

21 Q. The article states that Ms. Arafat was

1 Q. Did you consider whether she

2 personally had any motive in giving an untrue  
3 explanation for why she stayed in Paris during  
4 the Second Intifada?

5 **A. No.**

6 Q. The article also says that Ms. Arafat  
7 claimed that Yasser Arafat was killed by Israel,  
8 correct?

9 **A. Let me take one second here.**

10 **(Witness pauses.)**

11 MR. YALOWITZ: I'm sorry. Can I have  
12 the question back?

13 MR. WISE: Yes. The article reports  
14 that Ms. Arafat has accused Israel of killing  
15 Yasser Arafat.

16 **A. I don't see that, unless you can point  
17 it to me.**

18 Q. Do you see the section at the bottom?

19 **A. Uh-huh.**

20 Q. Describing Ms. Arafat's request?

21 **A. Yes, she requested an autopsy.**

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1 explaining why she stayed in Paris during the  
2 Second Intifada, correct?

3 **A. She says that her husband told her,  
4 "You should remain in Paris."**

5 Q. What was the issue regarding Suha  
6 Arafat's presence in Paris during the Second  
7 Intifada?

8 **A. The article doesn't describe that.**

9 Q. Aside from the article, do you know  
10 anything about the circumstances of Suha Arafat  
11 being in Paris during the Second Intifada?

12 **A. I heard reports she went there for  
13 safety.**

14 Q. What reports?

15 **A. I can't recall.**

16 Q. What was the medium of the reports?

17 **A. Newspaper media, mainstream media  
18 sources. It's a long time ago.**

19 Q. Was she subjected to criticism because  
20 of that?

21 **A. I don't recall.**

1 Q. Okay. And the sentence that says,  
2 "Palestinians have accused Israel of causing  
3 Arafat's death"?

4 **A. Yes, but that's not her. That just  
5 says Palestinians.**

6 Q. Have you heard any reports that she  
7 has made that claim?

8 **A. I can't recall. It doesn't say it in  
9 the article here.**

10 Q. Do you credit the claim in the article  
11 made by Palestinians that Israel has caused  
12 Arafat's death?

13 **A. I've heard the claim by some  
14 Palestinians that perhaps he was murdered.**

15 Q. Do you find that to be a credible  
16 claim?

17 **A. I do not know.**

18 Q. Let's talk about this organization  
19 MEMRI. You said that you've never been to the  
20 institute, correct?

21 **A. No.**

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1 Q. Are you familiar with a person named  
2 Yigal, Y-I-G-A-L, Carmon, C-A-R-M-O-N?

3 A. Well, let me take that back. I don't  
4 think I've ever been to the institute. I visited  
5 a lot of ministries when I was in Israel on one  
6 of my trips, introduced to a lot of people. To  
7 the best of my knowledge, I haven't.

8 Q. Do you know who Carmon is?

9 A. What was the name?

10 Q. Yigal, Y-I-G-A-L, Carmon, C-A-R-M-O-N.

11 A. Again, that name sounds familiar, but  
12 you'll have to forgive me. I just, I can't place  
13 it. If you'll give me a clue.

14 Q. Are you aware that MEMRI has been  
15 accused of anti-Arab bias?

16 A. It would surprise me if they hadn't.

17 Q. Why is that?

18 A. It's common knowledge. I mean, the  
19 Israelis and the Israeli Government is the most  
20 maligned Government on the face of the planet  
21 next to our Government by a variety of

1 Looking at this document, do you recall ever  
2 having seen this debate between Carmon and  
3 Whitaker?

4 A. I have not seen this document before.

5 Q. Let me ask you to turn to the second  
6 page.

7 A. Okay.

8 Q. Which is a statement under the heading  
9 Brian Whitaker, and ask you to turn to the third  
10 paragraph, where Whitaker says, "My problem with  
11 Memri is that it poses as a research institute  
12 when it's basically a propaganda operation. As  
13 with all propaganda, that involves a certain  
14 amount of dishonesty and deception. The items  
15 you translate are chosen largely to suit your  
16 political agenda. They are unrepresentative and  
17 give an unfair picture of the Arab media as a  
18 whole."

19 MR. YALOWITZ: I'm sorry, bear with me  
20 for a minute. I just want to look at the  
21 document.

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1 organizations and nations around the world.

2 Q. Do you believe that MEMRI is an  
3 institution of the Israeli Government?

4 A. No.

5 Q. Do you know Brian Whitaker? Have you  
6 ever heard that name?

7 A. I don't recall.

8 Q. Are you familiar with a Guardian  
9 newspaper?

10 A. Oh, yes.

11 Q. Guardian is a UK newspaper?

12 A. Yes.

13 Q. Do you believe that to be a reliable  
14 source?

15 A. It's considered to be a mainstream  
16 media source.

17 MR. WISE: Mark this.

18 (Defendants' Deposition Exhibit Number  
19 254 was marked for identification.)

20 BY MR. WISE:

21 Q. This is Defendants' Exhibit 254.

1 MR. WISE: Uh-huh.

2 Q. Do you see that?  
3 (Witness Reviews Document.)

4 Q. Have you had a chance to read it,  
5 Professor?

6 A. Yes, it's pretty long.

7 Q. You weren't familiar with this  
8 discussion between Whitaker and Carmon?

9 A. Not this particular discussion, no.

10 Q. Did the concerns about MEMRI's  
11 credibility raised by Whitaker cause you any  
12 concern about relying on MEMRI as a source for  
13 your report?

14 A. Does this report cause me any  
15 concerns?

16 Q. Yes.

17 A. Oh, I would have to look at the report  
18 and really get more information about who these  
19 individuals are, but it appears that the debate,  
20 some of the points that were brought out on the  
21 translation issue, on that one instance there's

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1 no organization that's going to be perfect in  
2 everything they do, but, I don't know, I still  
3 trust -- you know, I trust that this organization  
4 could not exist if they had more than a five  
5 percent error in what they were translating  
6 because it would become extremely common  
7 knowledge that they were not reputable, more than  
8 just a debate between two people that they had  
9 some issues. I think the issue would have come  
10 out in a larger avenue than this if it was true.

11 Q. Okay. Take a look at 253, which is  
12 there.

13 (Defendants' Deposition Exhibit Number  
14 255 was marked for identification.)

15 THE REPORTER: 255 counsel.

16 MR. WISE: I'm sorry, 255. Thank you.

17 Q. And I'm going to point your attention  
18 specifically to the last paragraph on the first  
19 page, which quotes a gentleman named Vincent  
20 Cannistraro, C-A-N-N-I-S-T-R-A-R-O. Do you know  
21 who that is?

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1 A. I'm sorry, which page are you on? I'm  
2 sorry.

3 Q. End of Page 1, beginning of Page 2.

4 A. Okay. I certainly know who Thomas  
5 Friedman and Richard Cohen are, but let's see.  
6 (Witness Reviews Document.) Okay.  
7 I've read it.

8 Q. Do you know who Vincent Cannistraro  
9 is?

10 A. I've heard the name.

11 Q. This article reports that he is the  
12 former head of CIA's counterintelligence unit.  
13 Do you have any reason to believe that is not  
14 accurate?

15 A. I think that's correct.

16 Q. And his quote, according to this  
17 article, is they -- about MEMRI is, "They are  
18 selective and act as propagandists for their  
19 political point of view, which is the  
20 extreme-right of Likud. They simply don't  
21 present the whole picture." Correct?

1 A. That's his opinion, yes.

2 Q. Does that opinion cause you to  
3 reevaluate your reliance on MEMRI as support for  
4 the positions you've taken in your report?

5 A. In and of itself, no.

6 Q. You, on Page 18 of your report, start  
7 a section titled Americans Killed During Second  
8 Intifada. Do you see that section?

9 A. Yes.

10 Q. And at the start, it states,  
11 "According to the Israeli Security Agency (Shin  
12 Bet or Shabak) between September 29, 2000 and  
13 2004, at least 1,028 innocent people died as a  
14 result of Palestinian terror attacks." Do you  
15 see that?

16 A. Yes.

17 Q. What is Shabak?

18 A. Well, it's an agency within the  
19 Israeli Government that is charged with, among  
20 other things, special operations.

21 Q. And what is Shin Bet?

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1 A. That's a synonym for Shabak.

2 Q. Okay. Your citation is to a Shabak  
3 report, correct?

4 A. My citation is Footnote 20, which is  
5 the Israeli Security Agency.

6 (Defendants' Deposition Exhibit Number  
7 256 was marked for identification.)

8 BY MR. WISE:

9 Q. Do you recognize 256 as the document  
10 cited in Footnote 20?

11 A. That's the one.

12 Q. Can you tell me, based on the document  
13 in Footnote 20, how you verified the number 1,028  
14 innocent people?

15 A. There have been several calculations,  
16 as you know, from different sources about the  
17 number of individuals that have been murdered.  
18 This is just one source.

19 Q. This is the document that's cited,  
20 though, correct?

21 A. This is the one that I cited, yes.

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1 Q. So can you tell me how you got to the  
2 number that's in your report based on the  
3 document you're holding in front of you?

4 **A. This is not a quotation, it's a cite,**  
5 **so I don't have any parentheses around the**  
6 **figures.**

7 Q. Do you have any idea where the number  
8 1,028 came from?

9 **A. The document lists 1,178, but that's**  
10 **the end of 2009. Well, let's see. Let me look**  
11 **at the charts.**

12 Q. Professor, as you sit here today, do  
13 you have any idea how that number was derived?

14 **A. Oh, I'd have to look at the chart**  
15 **again. Again, there's a lot of charts, facts and**  
16 **figures. I know that Congress has reached a**  
17 **slightly different number in their findings. So**  
18 **if we're trying to determine the exact number,**  
19 **this is one of many reports. It's an**  
20 **approximate. You know, the exact body count**  
21 **here, let me see if I can find it from the**

1 **A. Yes.**

2 Q. The word "innocent," do you see that  
3 in the report that's cited at Footnote 20?

4 **A. That's an amplifier that I added. You**  
5 **know, when you use violence and you have no**  
6 **lawful right to use violence, then the victims**  
7 **obviously are innocent people there. You have no**  
8 **right to kill them.**

9 Q. You then list in bullet form a number  
10 of individual people that were killed, correct?

11 **A. Yes. Do you want me to add this up**  
12 **again, or are we gone from that?**

13 Q. No, we're gone from that.

14 **A. Okay. I might have got it right, but**  
15 **that's how I got it.**

16 MR. YALOWITZ: Before we leave the  
17 topic of a thousand and 28, I'll just represent  
18 that I did the math and I got a thousand and 28,  
19 so I'm comfortable that the numbers on the chart  
20 add up. We can stipulate to that.

21 Q. You didn't do the addition when you

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1 charts.

2 (Witness Reviews Document.)

3 **A. If you add the figures in the chart on**  
4 **the first page between the period of 2000 and**  
5 **2004, unless my math is off, I get 1,018, and not**  
6 **1,028, so apparently I'm off by 10.**

7 Q. When you say you're off by 10, you  
8 didn't calculate that number, did you?

9 **A. I just did calculate it, yes.**

10 Q. When the report was written that you  
11 signed, you did not pen that number, right?

12 **A. No, I didn't do the math. I didn't**  
13 **add them all up. I looked at the chart and I**  
14 **assumed that the math was correct.**

15 **Let me add it one more time. Maybe**  
16 **I've got it wrong right now. I'm adding the**  
17 **figures on the chart, but no, I didn't**  
18 **double-check the math.**

19 Q. Let me ask you this: You say in your  
20 report that this is 1,028 innocent people,  
21 correct?

1 signed your report?

2 **A. I looked at the chart. I didn't add**  
3 **up every figure, no.**

4 Q. So you just gave me a description of  
5 why you added the word "innocent," right?

6 **A. Yes.**

7 Q. And then you list a number of  
8 individuals by bullet point, correct?

9 **A. In the report, yes.**

10 Q. The second person is Rabbi Benjamin  
11 Kahane, correct? K-A-H-A-N-E.

12 **A. And his wife, yes.**

13 Q. Who is Benjamin Kahane?

14 **A. I don't understand the question.**

15 Q. Do you know who Benjamin Kahane is?

16 **A. I've never met him, no.**

17 Q. Okay. Do you know that he was the  
18 leader of a group called Kahane Chai, C-H-A-I?

19 **A. If it's the same one, that's a very**  
20 **common name. That may be the same person. I**  
21 **don't know. I've heard of the group.**



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1 Q. You know that Kahane Chai is a  
2 designated foreign terrorist organization,  
3 correct?

4 **A. I do not know that without looking at**  
5 **the State Department list.**

6 Q. Take a look at Exhibit 248.

7 **A. I see it listed on the front page of**  
8 **Chapter 6.**

9 Q. This is the report that you used and  
10 cited as a designation of the Al-Aqsa Martyrs  
11 Brigade, correct?

12 **A. I believe I used this report. I know**  
13 **I used several reports. I have to check the**  
14 **dates again, but I'll assume that's correct.**

15 Q. You'd agree with me that Kahane Chai  
16 is listed on this report --

17 **A. Yes.**

18 Q. -- of designated foreign terrorist  
19 organizations, correct?

20 **A. Yes.**

21 Q. Based on your definition of

1 **anticipatory self-defense.**

2 Q. What is it called when an Israeli  
3 who's on the designated foreign terrorist  
4 organization list is killed?

5 **A. Well, it depends on who kills him.**

6 Q. Let's assume it was a Palestinian that  
7 killed him.

8 **A. The Palestinians do not have the right**  
9 **to engage in violence. They are not acting in**  
10 **accordance with Article 51 of the UN Charter.**  
11 **They can use other means.**

12 **In other words, they're not -- they**  
13 **would use the process of notifying the**  
14 **appropriate country where that person's located,**  
15 **ask them to arrest that person, but they have no**  
16 **right to violate the sovereignty of another**  
17 **nature and to engage in violence against an**  
18 **individual.**

19 Q. Page 20 of your report, you state, "It  
20 was (and remains) common knowledge that tens of  
21 thousands of Israeli citizens are dual nationals

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1 "innocent," would you still include that name in  
2 your list of innocents killed during the Second  
3 Intifada?

4 **A. Yes. It's not the -- it's not the**  
5 **guilt of the victim. It's the justification of**  
6 **the one that uses force.**

7 Q. If Israel killed a Hamas terrorist,  
8 how would you describe that?

9 **A. Well, I would describe it as a**  
10 **justified use of self-defense.**

11 Q. Because the Hamas terrorist was  
12 designated as a terrorist?

13 **A. Well, not just because they're**  
14 **designated as a terrorist, but, you know, you**  
15 **have to -- in the targeted consideration, you've**  
16 **got to evaluate who the person is because the**  
17 **label "terrorist" can be used quite widely. Is**  
18 **that person engaging in unlawful violence,**  
19 **conspiring to engage in it, soliciting to engage**  
20 **in it, and, therefore, nations have the right to**  
21 **respond in self-defense? It's called**

1 who hold US citizenship (there are approximately  
2 300,000 today)."

3 **A. I see that sentence, yes.**

4 Q. And you cite to a 2012 USA Today  
5 article, correct?

6 **A. Yes.**

7 Q. Why did you choose to use a 2012  
8 article regarding population when you're writing  
9 a report about 2000 to 2004?

10 **A. Well, it's -- again, it's common**  
11 **knowledge that there are individuals that do**  
12 **that. I suppose that that report was directly on**  
13 **point for the issue, and, therefore, I chose**  
14 **that, although obviously you could choose many,**  
15 **many reports that have talked about that issue.**  
16 **I assume a quick Lexis search or a Google search**  
17 **would pop up lots of reports. Why I used this**  
18 **report, I don't know.**

19 Q. You didn't choose it, right?

20 **A. I chose this report. This is my work.**

21 Q. The document that was sent to you in

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<p>1 draft, did it have that footnote in it?</p> <p>2 <b>A. I believe it did. I believe it did.</b></p> <p>3 Q. And explain to me how a 2012 USA Today</p> <p>4 article establishes what was common knowledge to</p> <p>5 the PA during the Second Intifada.</p> <p>6 <b>A. I wouldn't even need a footnote for it</b></p> <p>7 <b>to be common knowledge. It's common knowledge</b></p> <p>8 <b>that Jerusalem is a center of tourism, that</b></p> <p>9 <b>thousands of Americans visit that site year</b></p> <p>10 <b>round.</b></p> <p>11 Q. Common knowledge to who, Professor?</p> <p>12 <b>A. Anybody.</b></p> <p>13 Q. Anybody?</p> <p>14 <b>A. Any knowledgeable person that reads</b></p> <p>15 <b>any type of language, that knows anything about</b></p> <p>16 <b>Jerusalem, that knows anything about Israel,</b></p> <p>17 <b>knows that one of their major sources of income</b></p> <p>18 <b>is tourism, and many Jews in Israel have direct</b></p> <p>19 <b>connections with the United States. If it's not</b></p> <p>20 <b>common knowledge to someone, I would question</b></p> <p>21 <b>what would be common knowledge to them.</b></p>	<p>1 <b>common knowledge. That's what the State</b></p> <p>2 <b>Department does, based on my knowledge of working</b></p> <p>3 <b>with the State Department over the years. I</b></p> <p>4 <b>mean, they send out cables. They communicate</b></p> <p>5 <b>with their Embassies and with their counterparts,</b></p> <p>6 <b>and they put these warnings out on a regular</b></p> <p>7 <b>basis.</b></p> <p>8 Q. Do you have any specific knowledge</p> <p>9 that these travel warnings you cite in your</p> <p>10 report were, in fact, communicated to the</p> <p>11 Palestinian Authority?</p> <p>12 <b>A. I couldn't tell you exactly who it</b></p> <p>13 <b>went to, no.</b></p> <p>14 MR. WISE: Want to break for lunch?</p> <p>15 MR. YALOWITZ: Whenever you're ready.</p> <p>16 MR. WISE: Why don't we break until</p> <p>17 1:00.</p> <p>18 (Luncheon recess taken at 12:20 p.m.)</p> <p>19</p> <p>20</p> <p>21</p>
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<p>1 Q. And you believe it's common knowledge</p> <p>2 to those who perpetrated the various attacks at</p> <p>3 issue in this case?</p> <p>4 <b>A. Has to be.</b></p> <p>5 Q. Why does it have to be?</p> <p>6 <b>A. They live there. I mean if I know</b></p> <p>7 <b>that and I don't live there, certainly a fortiori</b></p> <p>8 <b>they're going to know that since they live there.</b></p> <p>9 Q. Okay. You also cite to a number of</p> <p>10 State Department travel warnings that you say</p> <p>11 were, "Obviously issued to Americans but they</p> <p>12 were conveyed via State Department channels each</p> <p>13 time to the Palestinian Authority," correct?</p> <p>14 <b>A. Yes. The PA certainly had knowledge</b></p> <p>15 <b>that Americans were in danger. Americans were in</b></p> <p>16 <b>Israel.</b></p> <p>17 Q. What's your basis for stating that the</p> <p>18 travel warnings were conveyed via State</p> <p>19 Department channels each time to the Palestinian</p> <p>20 Authority?</p> <p>21 <b>A. Habit. I mean that's pretty much</b></p>	<p>1 A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N</p> <p>2 (1:08 p.m.)</p> <p>3 BY MR. WISE:</p> <p>4 Q. So, Professor, let me just start with</p> <p>5 the same question I asked you before: Did you</p> <p>6 speak about the substance of your testimony with</p> <p>7 anyone during the break?</p> <p>8 <b>A. Absolutely not.</b></p> <p>9 Q. Let me turn your attention to Page 22</p> <p>10 of the March 2013 report.</p> <p>11 <b>A. Okay. I've got to find your copy now</b></p> <p>12 <b>because I was working off my copy. Page 13?</b></p> <p>13 Q. No, Page --</p> <p>14 <b>A. I'm sorry. 22, you said.</b></p> <p>15 Q. -- 22, right.</p> <p>16 <b>A. Okay.</b></p> <p>17 Q. This is the beginning of the section</p> <p>18 that describes a number of actions by the U.S.</p> <p>19 Congress, right?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. You start with the statement that</p>

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1 Congress, "Made it clear that it was concerned  
2 about the role the PA played in the violence, and  
3 consistently called upon the PA to halt the  
4 intifada immediately. Their concern was  
5 primarily focused on ending the violence, without  
6 specific regard for potential American  
7 casualties." Correct?

8 **A. Yes.**

9 Q. Okay. And the first example is House  
10 Resolution 5500, right?

11 **A. Yes.**

12 **(Defendants' Deposition Exhibit Number**  
13 **257 was marked for identification.)**

14 **BY MR. WISE:**

15 Q. For starters, this is a bill -- you  
16 see 257, correct?

17 **A. Correct.**

18 Q. And this is H.R. 5500?

19 **A. Yes.**

20 Q. This is a bill that was introduced in  
21 the House of Representatives by three members,

1 Q. And the other mention was at Page 3,  
2 Subparagraph 4?

3 **A. Yes.**

4 Q. There was no finding in this bill that  
5 the PA had committed acts on U.S. nationals,  
6 correct?

7 **A. No, there's no findings specifically**  
8 **identifying the PA.**

9 Q. Okay. The last paragraph of Page 22  
10 of your report references House Concurrent  
11 Resolution 426, right?

12 **A. Yes.**

13 Q. You understand that a concurrent  
14 resolution is not legislation, right?

15 **A. That's correct.**

16 Q. It is just a statement of Congress?

17 **A. Yes. It's a resolution.**

18 MR. WISE: Mark this.

19 **(Defendants' Deposition Exhibit Number**  
20 **258 was marked for identification.)**

21 **BY MR. WISE:**

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1 right?

2 **A. Yes.**

3 Q. And it was referred to the Committee  
4 on the Judiciary?

5 **A. Yes.**

6 Q. And the bill was never voted on,  
7 correct?

8 **A. As far as I know, no.**

9 Q. This Bill 5500, you'd agree with me,  
10 only refers to the Palestinian Authority in two  
11 places?

12 **A. I do not have my copy where I've**  
13 **marked it up, so I'm going to have to --**

14 MR. YALOWITZ: Just take your time.  
15 **(Witness reviews document.)**

16 **A. That is correct.**

17 Q. One was a call for the stationing of  
18 U.S. personnel within Palestinian Authority  
19 territory to administer the Act, correct?

20 **A. Yes. That would be on Page 4, Bow**  
21 **Legs 7.**

1 Q. So Exhibit 258 is House Concurrent  
2 Resolution 426, correct?

3 **A. Yes.**

4 Q. And this concurrent resolution  
5 includes language cited in your report  
6 condemning, "The Palestinian leadership for  
7 encouraging the violence and doing so little for  
8 so long to stop it, resulting in the senseless  
9 loss of life."

10 **A. Yes.**

11 Q. What fact finding did Congress do  
12 before passing this concurrent resolution?

13 **A. I have no personal knowledge of what**  
14 **the mechanics were that produced the resolution,**  
15 **but I do know that the resolution was passed, I**  
16 **have it in my other report, by an overwhelming**  
17 **majority, bipartisan, I mean overwhelming. So**  
18 **the findings were not something that was done by**  
19 **few members of Congress.**

20 Q. But you don't know what the process  
21 was that led to the things set forth in the

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1 whereas clauses, correct?

2 **A. I know what the general process is in**  
 3 **Congress. When they gather facts, they turn to**  
 4 **several organizations such as the Congressional**  
 5 **Research Service to provide information, facts to**  
 6 **them. They have staffs that provide information**  
 7 **to them.**

8 **So just on the basis of what I do now,**  
 9 **how the process works in general, I would assume**  
 10 **that that process was utilized in this case**  
 11 **because these are very serious matters, and**  
 12 **Congress would take them very seriously and, I**  
 13 **would assume, do their homework.**

14 Q. That's simply an assumption, right?

15 **A. It's an assumption based on my**  
 16 **knowledge of how Congress operates, yes.**

17 Q. And you have no knowledge that that  
 18 occurred with regard to this resolution?

19 **A. I do not.**

20 Q. Have you talked with any members of  
 21 Congress who wrote for this concurrent resolution

1 **A. Yes, I do.**

2 Q. -- excuse me, House Resolution 5522?

3 **A. Yes.**

4 Q. This included no factual findings?

5 **A. There are no factual findings here.**  
 6 **There's conclusions, so we must assume they had**  
 7 **facts to make the conclusions.**

8 Q. But you have no knowledge of what  
 9 facts they considered?

10 **A. No, sir.**

11 Q. This resolution was never passed,  
 12 correct?

13 **A. As far as I know, that's correct.**

14 Q. And you know that financial assistance  
 15 to the Palestinian Authority was not cut as a  
 16 result of this bill, correct?

17 **A. As far as I know, that's correct.**

18 Q. You then cite to House Resolution  
 19 1087, correct?

20 **A. Yes, I did.**

21 Q. Which is simply a reintroduction of

Page 215

Page 217

1 about 426?

2 **A. No. No.**

3 Q. The next cite to House Resolution  
 4 5522, on Page 23, correct?

5 **A. Yes.**

6 Q. This was a bill to prohibit U.S.  
 7 Assistance for the Palestinian Authority and for  
 8 programs, projects and activities in the West  
 9 Bank and Gaza?

10 **A. It's a resolution, yes.**

11 Q. The bill included no factual findings  
 12 whatsoever, right?

13 **A. I would have to look at the**  
 14 **resolution. I have it in the document you took**  
 15 **to get Xeroxed.**

16 MR. WISE: May I have this marked,  
 17 please.

18 (Defendants' Deposition Exhibit Number  
 19 259 was marked for identification.)

20 BY MR. WISE:

21 Q. You recognize that as Bill --

1 5522 in the next Congress, right?

2 **A. I believe so.**

3 Q. That also never passed?

4 **A. Not to my knowledge.**

5 Q. Footnote 33 refers to, "A group of 87  
 6 senators and 209 representatives called on  
 7 President Bush to not invite Yasser Arafat to the  
 8 White House until the intifada ceased," correct?

9 **A. Correct.**

10 Q. Your citation for that is to an  
 11 article in JTA, correct?

12 **A. Yes.**

13 MR. WISE: Mark this.  
 14 (Defendants' Deposition Exhibit Number  
 15 260 was marked for identification.)

16 BY MR. WISE:

17 Q. 260 is the article you cited in the  
 18 report?

19 **A. Yes.**

20 Q. JTA, under its symbol, is called the  
 21 Global News Service of the Jewish People,

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1 correct?

2 **A. That's correct.**

3 Q. Do you know who publishes JTA?

4 **A. No, I do not.**

5 Q. You said the article is an example of  
6 congressional concern regarding American  
7 casualties in the Intifada, correct?

8 **A. Yes.**

9 Q. Do you see any indication in this news  
10 report of congressional concerns regarding  
11 American casualties in the Intifada?

12 **A. I think it's implicit in the report.**

13 Q. That was a conclusion you've inferred?

14 **A. Yes.**

15 Q. The last sentence in the article  
16 states that, "Secretary of State Colin Powell met  
17 with Arafat during his tour of the Middle East in  
18 February, and both Bush and Powell have spoken to  
19 him on the telephone." Correct?

20 **A. That's what it says.**

21 Q. Do you take that to mean that the

1 Q. Which is, again, identical to House

2 Resolution 5500, which you had previously cited,  
3 correct?

4 **A. I have to check and see if it's  
5 identical or not. 5522?**

6 Q. 5500.

7 **A. 5500. The short title is different.**

8 **The findings are the same. The rest of the  
9 document seems to be the same except for Section  
10 4, where the fiscal years are different.**

11 **Everything else appears to be the same.**

12 Q. It's fair to say that this is the same  
13 bill introduced in the Senate, correct?

14 **A. Same bill, different year.**

15 Q. This bill was referred to committee  
16 and never voted out of committee, correct?

17 **A. Yes, that's correct.**

18 Q. Look with me, if you will, at 24.

19 **A. Page 24?**

20 Q. Page 24, the first full paragraph.

21 **A. Okay.**

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1 White House did not agree with the strategy of  
2 isolating Arafat as proposed by the Congress men  
3 and women?

4 **A. No, I took that to mean that, in a  
5 common sense reading, that obviously the United  
6 States has been working for a long time to  
7 achieve peace in the Middle East, and I took that  
8 to mean that they were attempting to continue  
9 with that policy.**

10 Q. You then cite Senate Bill 1377 in  
11 Footnote 34, correct?

12 **A. Yes, I believe I have that in my other  
13 report as well, more fully cited.**

14 Q. Okay.

15 MR. WISE: Can you mark that as 261.  
16 (Defendants' Deposition Exhibit Number  
17 261 was marked for identification.)

18 BY MR. WISE:

19 Q. 261 in front of you is Senate Bill  
20 1377, correct?

21 **A. Yes.**

1 Q. You say, "In the months that followed,  
2 Congress continued to pass legislation that  
3 condemned the Palestinian Authority," cite  
4 Footnote 37?

5 **A. Yes.**

6 Q. And again, 37 cites to House  
7 Concurrent Resolution 202, correct?

8 **A. That's correct.**

9 Q. And we've agreed that a House  
10 concurrent resolution is not legislation?

11 **A. No. But it does reflect the opinion  
12 of Congress.**

13 Q. But the representation in the first  
14 sentence that this was "legislation" is  
15 inaccurate, correct?

16 **A. Well, I'm using the term "legislation"  
17 in the sense that it's a congressional  
18 resolution, but I probably could have used a  
19 better word. But it falls under the main rubric.**

20 Q. And for all of these congressional  
21 actions that you've cited, your answer about --



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1 strike that. Sorry.

2 For all of the pieces of congressional  
3 action that you cite, you don't have any specific  
4 knowledge of what process Congress undertook in  
5 terms of fact finding, right?

6 **A. I do have knowledge about how Congress**  
7 **tasks individuals to gather information for them,**  
8 **to gather facts and make decisions.**

9 Q. But that knowledge is in a general  
10 sense?

11 **A. In a general sense. I, myself, have**  
12 **been asked to produce information for Congress so**  
13 **they could use that information. About these**  
14 **particular ones, I don't have any personal**  
15 **knowledge on the specifics of how the information**  
16 **was gathered.**

17 Q. And none of the times that Congress  
18 has requested information from you, were those  
19 requests related to any of the bills, resolutions  
20 or concurrent resolutions you cite in either the  
21 first report or in your rebuttal report?

1 **basic contention was -- if I could get the**  
2 **Robinson report, I can read it -- but there was**  
3 **no culpability on the part of the PLO, Yasser**  
4 **Arafat or the PA associated with the terrorist**  
5 **attacks.**

6 Q. Throughout your rebuttal report, you  
7 don't cite to specific parts of the Robinson  
8 report at all, correct?

9 **A. No.**

10 Q. In fact, the name Robinson doesn't  
11 appear again after your title, right?

12 **A. No.**

13 Q. Is the spelling of your name correct  
14 in the name line?

15 **A. I hope it is. A-D-D-I-C-O-T-T. Yes.**

16 Q. First name?

17 **A. Oops, that should be R-E-Y. I typed**  
18 **it myself also.**

19 Q. Let's start on Page 1.

20 **A. Okay.**

21 Q. You write on Page 1, in the last

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1 **A. That's correct.**

2 Q. Let's turn to the rebuttal report.  
3 (Defendants' Deposition Exhibit Number  
4 262 was marked for identification.)

5 BY MR. WISE:

6 Q. 262 is your rebuttal report, correct?

7 **A. That is correct.**

8 Q. And what portions of this report did  
9 you personally write?

10 **A. I'm the author for the entire report.**

11 Q. And by author, does that mean that you  
12 wrote every word that's in here?

13 **A. Yes.**

14 Q. You state in the third line that it is  
15 a, "Rebuttal to Robinson Report," correct?

16 **A. Yes, that's correct.**

17 Q. What specific evidence from the  
18 Robinson report was your rebuttal intended to  
19 contradict or rebut?

20 **A. Robinson had a lot of themes in his**  
21 **report, a lot of historical background, but his**

1 sentence, and this is about Yasser Arafat, "While  
2 portraying himself to the civilized world as a  
3 beacon of 'peace' and denouncing 'terrorism', the  
4 objective reality is that Yasser Arafat worked  
5 tirelessly to promote and encourage brutal acts  
6 of murder by means of terrorism in order to  
7 achieve personal and political goals," and you  
8 cite to a TIME Magazine article from 2011,  
9 correct?

10 **A. Yes. That's meant to be a general**  
11 **cite. There's no quotations there, and obviously**  
12 **I could -- you know, what I've written in this**  
13 **report, I'm not giving a full citation of all the**  
14 **cites that I could produce, but that's my**  
15 **conclusion.**

16 (Defendants' Deposition Exhibit Number  
17 263 was marked for identification.)

18 BY MR. WISE:

19 Q. This is the TIME article that you were  
20 referencing?

21 **A. Well, this doesn't appear to be the**

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1 full TIME article.

2 Q. How long was the full article?

3 A. I'd have to refer to my notes. Again,  
4 the footnote there, this introduction is a  
5 summary of my opinion. I simply threw that  
6 footnote in to buttress that point, but it's  
7 maybe in -- no, let's see here.

8 (Witness Reviews Document.)

9 A. Well, I mean, that just kind of stands  
10 for the proposition where we've got the quote  
11 here, "An unrepentant terrorist with a long  
12 legacy of promoting violence," I'm really saying  
13 it in a different way.

14 Q. The TIME article that you were citing  
15 didn't use the words "Objective reality is that  
16 Arafat worked tirelessly to promote and encourage  
17 brutal acts of murder," right?

18 A. No, they didn't use that language. If  
19 they would have, I would have quoted it as my  
20 language.

21 Q. But by dropping a footnote to this

1 2. Some of them are, "But see," which stands for  
2 a contradictory point. I don't think I have any  
3 "but sees" in this one. Some have, "See also."  
4 Some have, "Supra, infra." It depends on the  
5 context.

6 Q. Okay. But when you don't write  
7 something like, "See generally," or, "But see,"  
8 when you just cite to a document, as the reader,  
9 what is the reader to take from a citation to  
10 that source document?

11 A. Well, the footnote should amplify  
12 something in the sentence, and this footnote does  
13 amplify something in this particular sentence.

14 Q. And just point to me exactly what you  
15 believe it amplifies.

16 A. Well, it amplifies both sides of this  
17 coin, while portraying himself to the civilized  
18 world as a beacon of peace, and those are the  
19 people that, you know, buy into that propaganda  
20 that Arafat puts out, and then the other hand is  
21 my belief, based on my professional opinion, that

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1 article, all you were suggesting was that there  
2 was an article that related to the sentence?

3 A. Well, the article talks about the  
4 duplicity of the fact that you're a Nobel Peace  
5 Prize winner and yet, on the other hand, you also  
6 have -- you're an unrepentant terrorist with a  
7 long legacy of promoting violence, so that's my  
8 point.

9 Q. Does the TIME article say that Arafat  
10 was an unrepentant terrorist with a long legacy  
11 of promoting violence?

12 A. Well, it says his critics condemn him  
13 as being that, so they're giving both sides of  
14 the story. And I'm choosing to amplify that  
15 particular side of the story.

16 Q. So as a general rule, when you cite to  
17 a document in your rebuttal report, what should  
18 we take that citation to mean?

19 A. Depends on the citation. We'd have to  
20 go through each one of them. Some of them are  
21 meant as a, "See generally," as Footnote Number

1 the objective reality is quite the opposite.

2 Q. When you say that you think there's  
3 more to that article, are you saying you think  
4 there's more about Yasser Arafat in the article?

5 A. I don't have my original documents in  
6 front of me, so the document you produced, there  
7 are many, many documents that I go through on  
8 writing topics over the course of a week, so I  
9 would have to refer to my own notes.

10 Q. Let's talk about the second page.

11 A. Okay.

12 Q. And specifically I'm interested in the  
13 quote at the very top, where you cite Mr. Arafat  
14 as saying, "Struggle, struggle, struggle,  
15 struggle. Combat, combat, combat, combat.  
16 Jihad, jihad, jihad, jihad."

17 First of all, have you reviewed the  
18 video clip that is cited in the footnote?

19 A. No.

20 Q. Do you know what Arabic word Arafat  
21 used in this quote?

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1 A. No, I don't speak Arabic.

2 Q. This morning we had a discussion about  
3 the word "martyr" in connection with the Levitt,  
4 Matthew Levitt, piece; do you recall?

5 A. The word "murder?"

6 Q. The word "martyr."

7 A. Oh, martyr. Yes, I do recall that  
8 discussion.

9 Q. Do you know what Arabic word was used  
10 in that speech?

11 A. No.

12 Q. Let's turn back to the word "Jihad."  
13 In your opinion, is there any definition of the  
14 word "Jihad" that does not involve violent  
15 struggle?

16 A. Yes, there are.

17 Q. Tell me what that definition is?

18 A. I'd have to go into a discussion of  
19 Islam, but Islam has a variety of writings. They  
20 put great emphasis on different Imams. Many of  
21 them do not even come out of schools. They

1 to paradise and you have certain rewards.

2 So to answer your question, there are  
3 different meanings, but there's two main  
4 meanings. One is this moral, spiritual, try to  
5 live a better life, and the other one is kill.  
6 But then they use the term -- then there's a  
7 variation on the kill part, where some believe  
8 that it's an offensive obligation to go out and  
9 target individuals to kill them. The other  
10 school of thought says, "Yeah, you're going out  
11 to kill these individuals. Even though you're on  
12 the offense, you're actually defending the  
13 faith."

14 Q. So is it fair to say that there is a  
15 wide spectrum of definition of the word "Jihad?"

16 A. There are two main schools, as I  
17 indicated, and they are pretty far apart. One  
18 deals with moral obligations and following the  
19 rituals, and the other one deals with violence.  
20 In between, there's I guess what I can  
21 characterize as two main branches. It's not a

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1 simply take the title and have a following of  
2 individuals, and they make pronouncements.

3 So in the mainstream literature, Jihad  
4 can mean a spiritual quest to better yourself,  
5 associated with the pillars of Islam, and the  
6 pillars of Islam deal with obligations that  
7 you're expected to do if you're a Muslim in order  
8 to work your way into paradise before the  
9 judgment of Allah.

10 So it can mean a spiritual cleansing,  
11 a striving to do better in your life, to live by  
12 the moral code, i.e., the pillars of Islam. It  
13 also is used in a "defensive" term -- and again,  
14 defense, offense -- where they believe that some  
15 Imams teach -- and this is particularly the  
16 strain of Wahhabism, W-H-A-B-B-I-S-M (sic). But  
17 they believe that it's your duty to literally  
18 kill people that do not agree with your orthodox  
19 theology, and if you kill in the name of Jihad  
20 someone that is outside of your belief, you  
21 bypass the judgment of Allah and you go directly

1 spectrum, it's two main branches of the ideology,  
2 in my understanding.

3 Q. The quote that you cite to in your  
4 rebuttal report is from 1996, correct?

5 A. Yes.

6 Q. Do you know the context of the speech  
7 that Arafat was giving?

8 A. Well, again, I don't have the full  
9 text of the speech in front of me. I think a  
10 plain reading -- and again, when you compare it  
11 to the list of Arafat quotes I've got, you'll  
12 notice that many of them were from the mid '90s,  
13 late '90s, where he's advocating, in my opinion,  
14 violence, so I don't know the full context of  
15 that particular quote.

16 Q. Do you know where he was speaking?

17 A. I'd have to refer back to my notes. I  
18 don't have that in here.

19 What I generally do when I write a  
20 paper sometimes, in the articles I'll put a quote  
21 to kind of amplify the theme, and that's what I

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1 **did in this case.**

2 Q. And other than what you cited in your  
3 report, are there other bases for this particular  
4 opinion?

5 MR. YALOWITZ: Objection. I don't  
6 understand the question.

7 **A. What opinion?**

8 Q. You've cited this quotation, correct,  
9 and dropped a footnote?

10 **A. Right.**

11 Q. As part of your section called,  
12 "History of Yasser Arafat and the PLO?"

13 **A. Uh-huh.**

14 Q. And you've just said that based on the  
15 context -- well, strike that. Maybe you haven't  
16 said that.

17 What is the relevance of this quote to  
18 you?

19 **A. Well, it underscores the theme in Part**  
20 **2 that he was willing to use violence when**  
21 **necessary to achieve his ends. Whether that**

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1 **violence -- and that violence is indicated by the**  
2 **words, "Struggle, combat and Jihad," and, in my**  
3 **opinion, just looking at this sentence alone,**  
4 **this is not Jihad associated with being a better**  
5 **moral person individually. This is the Jihad for**  
6 **war because in the context you're talking about,**  
7 **combat and struggle.**

8 Q. And you can tell that without knowing  
9 who he was speaking to, right?

10 **A. Yeah, I can tell it by reading it.**

11 Q. Or what the circumstances of the  
12 speech were?

13 **A. I don't know the circumstances of this**  
14 **particular one without referring back to my**  
15 **notes.**

16 Q. On Page 3 of your rebuttal, you have a  
17 discussion of Force 17, right?

18 **A. Yes.**

19 Q. Which you allege was involved in  
20 terror attacks, mostly in the 1980s?

21 **A. Yes.**

1 Q. What opinion of Glen Robinson does  
2 this part of your rebuttal report rebut?

3 **A. Well, in his report, he was -- if I**  
4 **recall correctly, he indicated that Force 17 was**  
5 **not as powerful as individuals made it out to be.**  
6 **It had no connection with Yasser Arafat, as he**  
7 **did with all these organizations. So I'd have to**  
8 **look at his report and point you to the parts**  
9 **where he talked about Force 17. It's quite a**  
10 **lengthy report he had.**

11 Q. But you believe that he did write  
12 about Force 17 in his report?

13 **A. I think he did mention it.**

14 Q. In your discussion of Force 17, you  
15 state that Imad, I-M-A-D, Fa'iz,  
16 F-A-apostrophe-I-Z, Mughniyah, M-U-G-H-N-I-Y-A-H,  
17 achieved a high rank in Hezbollah.

18 **A. Yes.**

19 Q. Okay. And for that you cite to a  
20 Washington Post article, correct?

21 **A. February the 14th, 2008, yes.**

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1 Q. By writing that Mughniyah's shining  
2 achievement was his high rank in Hezbollah, are  
3 you suggesting that Hezbollah was somehow  
4 controlled by the PA or PLO?

5 **A. No.**

6 Q. So what is the relevance of his  
7 ascendancy in Hezbollah?

8 **A. Hezbollah is a terrorist organization**  
9 **that is so recognized by the U.S. Government, and**  
10 **it just indicates the mindset of this individual,**  
11 **that this is part and parcel of his modus**  
12 **operandi.**

13 Q. In your view, what is the  
14 relationship, if any, between Hezbollah and  
15 Fatah?

16 **A. I do not know the relationship between**  
17 **those two organizations.**

18 Q. What about between Hezbollah and the  
19 PA?

20 **A. Do not know. And Hezbollah is located**  
21 **out of Lebanon and they have other interests.**



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1 Q. In your opinion, is Hezbollah  
2 associated with Force 17?

3 **A. I don't have any specific information**  
4 **on that.**

5 Q. Tell me why you've included in your  
6 report a reference to this individual's high rank  
7 in Hezbollah.

8 **A. Again, they're both terrorist**  
9 **organizations.**

10 Q. At the top of that page, you state  
11 that, "Fatah, now under the umbrella of the PLO,  
12 continued to use violent attacks against innocent  
13 civilians, even though Fatah purported formally  
14 to renounce 'armed struggle' in accordance with  
15 the 1993 Oslo Accords," and you cite to a  
16 Congressional Research Service report, correct?

17 **A. Correct.**

18 **(Defendants' Deposition Exhibit Number**  
19 **264 was marked for identification.)**

20 **BY MR. WISE:**

21 Q. Exhibit 264, is that the document

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1 cited in your Footnote Number 11?

2 **A. It appears to be.**

3 Q. Now, is this an instance where --  
4 well, let me first ask this question: Can you  
5 point me to a place in this report where the CRS  
6 indicates that Fatah used violent attacks against  
7 innocent civilians?

8 **A. Well, let me look at the report again.**  
9 **Again, I don't have my copy that's marked.**

10 **(Witness Reviews Document.)**

11 **A. Okay. I believe my footnote was meant**  
12 **to amplify the second part of that sentence,**  
13 **where it says, "Even though Fatah purported**  
14 **formally to renounce 'armed struggle' in**  
15 **accordance with the 1993 Oslo Accords."**

16 Q. So the statement that Fatah continued  
17 to use violent attacks against innocent civilians  
18 is just your opinion, not drawn directly from  
19 this report?

20 **A. That is my opinion, but I believe the**  
21 **footnote was meant to amplify the second part of**

1 **the sentence.**

2 Q. The paragraph about the Al-Aqsa  
3 Martyrs Brigade includes the sentence that, "The  
4 Al-Aqsa Martyr Brigade, which emerged in 2000 at  
5 the time of the Second Intifada, operated with  
6 horrific violence against civilians during the  
7 Second Intifada, Footnote 14. Their goal was to  
8 use violence against civilians to force Israel to  
9 bend to Palestinian demands in 'peace' talks,  
10 Footnote 15."

11 Both of those citations are also to  
12 this CRS report which is Exhibit 264, correct?

13 **A. Let's see here.**

14 **(Witness Reviews Document.)**

15 **A. No, that's not. That's to the U.S.**  
16 **State Department website list of foreign**  
17 **terrorist organizations.**

18 Q. Okay. When you have Footnote 14 that  
19 says, "Id."?

20 **A. Oh, I see. Yes, you're right. That**  
21 **does go back to the U.S. Congressional Research**

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1 **Service, which -- yes.**

2 Q. And having looked at this document,  
3 can you point me to where the CRS report states  
4 that the Al-Aqsa Martyrs Brigade operated with  
5 horrific violence against civilians?

6 **A. Well, the report talks about the**  
7 **origins of the Brigades and the fact that they**  
8 **are a designated foreign terrorist organization,**  
9 **so there is -- that would be on Page -- under**  
10 **Fatah and the Palestinian Liberation Organization**  
11 **leadership instruction about the middle of that**  
12 **paragraph.**

13 Q. So it was the fact of the designation  
14 by the State Department that led you to say that  
15 they operated with horrific violence against  
16 civilians?

17 **A. Of course.**

18 Q. But that language, you would agree  
19 with me, is not in the CRS report?

20 **A. If it was, I would have quoted it.**

21 Q. Your next sentence where you drop a



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1 footnote after the sentence there, "Goal was to  
2 use violence against civilians to force Israel to  
3 bend to Palestinian demands in 'peace' talks,"  
4 and then you site to the CRS report, where in the  
5 CRS report do you see support for that  
6 contention?

7 **A. That's the general theme of the**  
8 **organization. And I'm not citing to that as the**  
9 **sole authority for that sentence; I just simply**  
10 **do an Id. to indicate that that report also**  
11 **amplifies that point, but that's an obvious**  
12 **statement in my mind.**

13 Q. Okay. It amplifies the point, but  
14 you'd agree the report doesn't actually make that  
15 point, correct?

16 **A. It doesn't use that same language, no,**  
17 **but that's obviously what they do. That's what**  
18 **it's all about.**

19 Q. But that's based on something other  
20 than what's in this report, correct?

21 **A. I wouldn't say that's correct, no.**

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1 **The general theme of the report supports that**  
2 **sentence.**

3 Q. Professor, point to me the part of  
4 this report that supports the sentence that  
5 Al-Aqsa Martyrs Brigades', "Goal was to use  
6 violence against civilians to force Israel to  
7 bend to Palestinian demands in 'peace' talks."

8 **A. Okay. "Additionally, three**  
9 **militia-type organizations have developed from**  
10 **Fatah: The Al-Aqsa Martyrs Brigade, a designated**  
11 **foreign terrorist organization that emerged**  
12 **during the intifada that began in September 2000,**  
13 **and takes a violent approach to force Israel to**  
14 **end its occupation," and that's basically what**  
15 **that sentence is saying in my paper, and that's**  
16 **another way to say it.**

17 Q. You think that's the same thing?

18 **A. Very similar.**

19 Q. Was the Al-Aqsa Martyrs Brigade  
20 involved in peace talks?

21 **A. Well, were they directly involved in**

1 **the peace talks?**

2 Q. Yes.

3 **A. No, they're not involved in the talks,**  
4 **but by their actions, they're influencing the**  
5 **outcome of the talks. That's the whole goal of**  
6 **terrorism.**

7 Q. On Page 3, you have a section about  
8 the Tanzim militia in the last paragraph?

9 **A. Yes.**

10 Q. In your initial report, you wrote that  
11 you had read the complaint in Sokolow versus PLO,  
12 correct?

13 **A. That's correct.**

14 Q. Which of the attacks in Sokolow are  
15 alleged to be the work of Tanzim?

16 **A. Well, as you look at the complaint,**  
17 **the complaint indicates a listing of various**  
18 **terrorists organizations, to include unknown**  
19 **organizations in that list, and so I think the**  
20 **complaint also uses the term "terrorism units" to**  
21 **indicate that these are groups that operate. So**

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1 **while you don't list them all in the complaint,**  
2 **the complaint does list some of them.**

3 Q. Is it your belief that the Sokolow  
4 complaint makes allegations against the Tanzim  
5 militia?

6 **A. They're included in it, I would say,**  
7 **yes.**

8 Q. You cite three times to a 2002 CRS  
9 report titled, "The PLO and its Factions,"  
10 correct?

11 **A. Let me check. I see three cites, yes.**

12 MR. WISE: I only have one copy of  
13 this for some reason, so I'm going to mark it.

14 MR. YALOWITZ: Why don't we pause for  
15 a moment.

16 MR. WISE: You want me to go copy it?

17 MR. YALOWITZ: Yeah. Actually, I  
18 think Jeffrey has a copy of it. It's June 10th,  
19 2012?

20 MR. WISE: Yeah. So let's mark this.

21 (Defendants' Deposition Exhibit Number

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1 265 was marked for identification.)

2 BY MR. WISE:

3 Q. So this is 265. Take a look at this  
4 and make sure that it matches what you're looking  
5 at in your notebook.

6 A. Okay.

7 (Witness Reviews Document.)

8 A. Looks like I Xeroxed every other page.  
9 Didn't push two-sided, pushed one-sided, so we  
10 have every other page of this document.

11 MR. YALOWITZ: Maybe we should just  
12 get a couple copies made.

13 MR. WISE: Sure. I apologize.

14 (Brief Recess.)

15 BY MR. WISE:

16 Q. Professor, you have 265 in front of  
17 you?

18 A. Yes.

19 Q. Which is the document cited Footnote  
20 21 of your rebuttal report?

21 A. Yes, it is.

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1 MR. YALOWITZ: I'm sorry, I have the  
2 wrong one.

3 MR. WISE: 265 is there.

4 BY MR. WISE:

5 Q. The copy that you came with today was  
6 missing every other page, correct?

7 A. Yes, it was.

8 Q. Did you have another copy of that  
9 document that you worked off of when you wrote  
10 this report?

11 A. Oh, yeah. Yes, I did.

12 Q. What did you do with that copy?

13 A. It's in my office.

14 Q. So look at 265, if you would.

15 A. Okay.

16 Q. And we were talking about your  
17 paragraph about Tanzim, correct?

18 A. Correct.

19 Q. You cite 265 three times in your  
20 review of Tanzim?

21 A. Correct.

1 Q. And you believe it to be accurate in  
2 its description of the Tanzim, correct?

3 A. I'd have to look at the context again.  
4 Again, the footnotes don't stand for every  
5 proposition in the sentence. It depends on what  
6 part of the sentence. We'd have to look at the  
7 sentence and dissect it.

8 Q. Is it fair to say that you found this  
9 document to be a credible document?

10 A. Yes. The CRS report, yes.

11 Q. This report also covers the Al-Aqsa  
12 Martyrs Brigade, correct?

13 A. Yes, it does.

14 Q. And on page CRS 5, the last paragraph  
15 starts, "The Al Aqsa Martyrs Brigade does not  
16 have a well defined structure and, of the  
17 factions discussed in this section, is the one  
18 over which Arafat would appear to have the least  
19 political control." Correct?

20 A. That's what it says.

21 Q. The next sentence says, "There is no

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1 firm evidence that Arafat selected any leaders or  
2 commanders of the Brigades or specifically  
3 authorized its formation." Right?

4 A. Yes.

5 Q. You didn't include either of those  
6 portions of the CRS report in your rebuttal,  
7 correct?

8 A. No, I didn't take any quotes from  
9 those sections.

10 Q. On the next page, the report  
11 concludes, in the first sentence of the first  
12 paragraph, "It is not possible from publicly  
13 available information to determine the exact  
14 extent to which Arafat is able to or has sought  
15 to control Palestinian factions that use  
16 violence." Correct?

17 A. That's what it says.

18 Q. You didn't cite that conclusion in  
19 your report, correct?

20 A. Well, I think I did to a degree  
21 because if you read the sentence, it says, "It's

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1 not possible to determine the exact extent," and  
 2 I think that's a correct statement, but I think  
 3 that goes without saying. You can't determine  
 4 the exact extent because, again, that's a pattern  
 5 that totalitarian leaders utilize when they  
 6 conduct acts of terror. They don't want to leave  
 7 a paper trail.

8 Q. Do you believe there's any portion of  
 9 your rebuttal report that suggests that, "It is  
 10 not possible from publicly available information  
 11 to determine the exact extent to which Arafat is  
 12 able to or has sought to control Palestinian  
 13 factions that use violence"?

14 A. I think I cover that point on Page 2  
 15 of my report, where I compliment Arafat as being  
 16 a master at duplicity. He was the perfect choice  
 17 for the PLO because he was very good at doing  
 18 that. Shrewd leader who embraced terrorism on  
 19 the one hand and portrayed himself as a man of  
 20 peace on the other.

21 Q. That is where you believe you

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1 acknowledge the sentiment in that sentence of the  
 2 CRS report?

3 A. Yes.

4 Q. On Page 4 of your report, you state  
 5 that pursuant to the, excuse me, 1993 Oslo  
 6 Accords, Israel, quote, "Recognized the  
 7 Palestinian National Authority (PNA) as the sole  
 8 legitimate representative of the Palestinian  
 9 people, with Arafat as its head period." Right?

10 A. Yes.

11 Q. You know that's factually incorrect,  
 12 right?

13 A. No, I don't.

14 Q. You believe that the PA or the PNA was  
 15 at some point the sole legitimate representative  
 16 of the Palestinian people?

17 A. Well, they were recognized, yes, as  
 18 the legitimate representative. But, again,  
 19 that's a function that Arafat was the head, so  
 20 they recognized -- basically, what I'm trying to  
 21 say is Arafat is the head of the Palestinian

1 people in terms of his leadership in the PA, the  
 2 PNA, PLO and Fatah.

3 Q. Aside from the text of the report, let  
 4 me just ask you this as a yes or no question: Is  
 5 it your opinion as you sit here today that the PA  
 6 has been recognized as the, "Sole legitimate  
 7 representative of the Palestinian people"?

8 A. The PA or the PNA.

9 Q. Let's start with the PA. Has the PA  
 10 ever been recognized as the sole legitimate  
 11 representative of the Palestinian people?

12 A. I believe it has.

13 Q. And what about the PNA?

14 A. I believe that's true, too.

15 Q. Later on Page 4 you cite to a Council  
 16 on Foreign Relations report from 2006 at Footnote  
 17 29, correct?

18 A. Correct.

19 Q. And that same piece is cited for your  
 20 last statement on that page, correct?

21 A. Well, when you say it's stated for

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1 that, again, it's a footnote, so it's associated  
 2 with that last sentence; that is correct.

3 Q. When you say, "It's associated with  
 4 that last sentence"?

5 A. Yes, I did say that.

6 Q. When you put the footnote there, what  
 7 is -- strike that. Let's go to the document.

8 (Defendants' Deposition Exhibit Number  
 9 266 was marked for identification.)

10 BY MR. WISE:

11 Q. Do you recognize 266 as the document  
 12 cited in your Footnotes 29 and 30?

13 A. This appears to be that document.

14 Q. You first cite it for the proposition  
 15 that, "Accordingly, when it came to fending off  
 16 accusations that he failed to combat terrorism,  
 17 Arafat would maintain with a straight face that  
 18 he was doing everything in his power to fight  
 19 it."

20 Did I read that correctly?

21 A. That is a correct reading of that

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1 sentence.

2 Q. And you are now saying that when you  
3 dropped the footnote, it was to amplify your  
4 statement, not to suggest that this document  
5 supported that conclusion; am I understanding you  
6 correctly?

7 A. I need to read the document again. I  
8 don't have my original copy in front of me. I  
9 notice this one is dated December of 2005.

10 (Witness Reviews Document.)

11 A. I'm not sure this is the one I cited  
12 to. I'll just read it real quick.

13 (Witness Reviews Document.)

14 A. It substantially looks like the same  
15 document. So your question is: Does this  
16 document amplify some part of that sentence?  
17 Yes.

18 Q. But when you drop a footnote to it,  
19 you're not suggesting that this report directly  
20 supports the contention you make in the sentence;  
21 is that your testimony?

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1 A. What does "drop a footnote" mean?

2 Q. Write a footnote at the end of the  
3 sentence and then cite to this article.

4 A. It depends. It depends on the  
5 sentence and on the footnote. So this particular  
6 sentence, you can amplify some of, you know, the  
7 content from this report, yes.

8 Q. Okay. So point to me in the exhibit,  
9 266, what portion of 266 you were referring to  
10 when you cited this article in Footnote 29.

11 A. I call your attention to the top  
12 portion, third line, fourth line down on the  
13 second page, where it has, "PA leaders insisted  
14 Arafat was doing all he could to fight  
15 terrorism." And then a little further down,  
16 "Israeli attacks have destroyed the very forces  
17 Arafat could have used to crack down on  
18 terrorism," and that would answer Footnote 30 on  
19 Page 4 of my white paper.

20 Q. So you're citing to the portion of the  
21 article that states that PA officials claimed

1 Israeli attacks destroyed forces the PA could  
2 have used to crack down, correct?

3 A. In my report, yes.

4 Q. And that's support for the sentence  
5 that reads, "His efforts to portray his sense of  
6 helplessness included circular arguments claiming  
7 that Israeli attacks on those responsible for  
8 terrorism destroyed the very forces he could have  
9 used to crack down on terrorism!"?

10 A. Uh-huh. Yes.

11 Q. On Page 5, you cite to a 2002  
12 Congressional Research Service report titled  
13 "Terrorism: Near Eastern Groups and State  
14 Sponsors."

15 A. Yes.

16 Q. For the proposition that  
17 administrative reports, "Consistently found that  
18 factions associated with the PLO encouraged or  
19 participated in illegal violence against  
20 civilians in Israel," correct?

21 A. That's correct.

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1 (Defendants' Deposition Exhibit Number  
2 267 was marked for identification.)

3 BY MR. WISE:

4 Q. Is 267 the document you cited in the  
5 Footnote 31?

6 A. I believe it is. Yes, I recognize the  
7 front of it and the Table of Contents. Yes, yes  
8 it is.

9 Q. Now, in your footnote you don't cite  
10 to a -- oh, you do cite to a specific page,  
11 excuse me. So let's turn to Page 23.

12 A. Okay, I'm on Page 23.

13 Q. And tell me, as you look at this,  
14 where the support is on this page for the  
15 assertion that administration reports, plural,  
16 "Consistently found that factions associated with  
17 the PLO encouraged or participated in illegal  
18 violence against civilians in Israel."

19 A. Well, I believe I'm referring to the  
20 first full paragraph and four lines down.

21 Q. Which reads, "An Administration report

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1 to Congress on PLO compliance with the  
2 commitments (covering December 15, 2000 through  
3 June 15, 2001) alleges that factions of the PLO  
4 have encouraged or participated in violence  
5 against Israel," correct?

6 **A. Yes. And then you could include the**  
7 **rest of that as well, so this is an example of an**  
8 **administrative report that amplifies my general**  
9 **sentence that -- in the plural, and in that, I**  
10 **would include, of course, the broader reports**  
11 **that Congress has issued that I list in the white**  
12 **paper.**

13 Q. The document you cite refers to a  
14 single report, right?

15 **A. The footnote refers to a single**  
16 **report, yeah. The footnote is quoting a single**  
17 **report, and I use that as an example of one, but**  
18 **my opinion is that there are numerous**  
19 **administrative reports, and I would include in**  
20 **that the resolutions, the bills as administration**  
21 **in the broader sense, our legislative branch.**

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1 Q. Okay. You say in that same sentence,  
2 "The PLO encouraged or participated in illegal  
3 violence against civilians in Israel."

4 Looking at the Congressional Research  
5 Service document you cited, would you agree with  
6 me that the report does not include the words  
7 "illegal" or "against civilians?"

8 **A. Well, terrorism is illegal by**  
9 **definition, and the targets of terrorism are**  
10 **generally civilians, so it's included in there,**  
11 **in my opinion. Doesn't specifically use those**  
12 **two words.**

13 Q. So this is another example of where  
14 you amplified what was in the document that you  
15 cited?

16 MR. YALOWITZ: Object to the form.

17 **A. Violence against Israel, it's obvious**  
18 **that the violence in question is towards**  
19 **civilians in Israel, and the violence is illegal.**

20 Q. So it's another example of where you  
21 amplified --

1 **A. Clarified.**

2 Q. -- something that was not --

3 MR. YALOWITZ: Object to the form.

4 **A. I'd use the word "clarified".**

5 Q. But you amplified something that was  
6 not in the original document?

7 MR. YALOWITZ: Objection.

8 Q. You can answer.

9 **A. I wouldn't say "amplified." I'd say**  
10 **"clarified." So no. The answer is no.**

11 Q. You clarified something that was not  
12 in the original report?

13 **A. I made it clearer.**

14 Q. Turn to Page 6 of your rebuttal  
15 report. You state that, in the second paragraph,  
16 third line, "A 2012 United States Congressional  
17 Research Service report claims that 'since Oslo  
18 in 1993, these groups [Palestinian terror  
19 organizations] have engaged in a variety of  
20 methods of violence, killing approximately 1,350  
21 Israelis (over 600 civilians" --

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1 MR. YALOWITZ: Objection.

2 **A. Nine hundred.**

3 Q. Excuse me?

4 **A. You said 600. It says 900.**

5 Q. Nine hundred. Thank you.

6 --" including Jewish settlers in the  
7 Palestinian territories - and 450 security force  
8 personnel)," correct?

9 **A. That's what it says.**

10 Q. And you cited to this Congressional  
11 Research Service report from 2012?

12 **A. Yes.**

13 MR. WISE: Mark that.

14 (Defendants' Deposition Exhibit Number  
15 268 was marked for identification.)

16 BY MR. WISE:

17 Q. First question: You added the  
18 [Palestinian terror organizations] language,  
19 correct?

20 **A. That's correct.**

21 Q. The report itself names specific



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1 organizations, and I'll direct your attention to  
2 Page 11.

3 **A. I'm with you.**

4 Q. And then the specific groups that the  
5 report identifies are Hamas, the Abu Nidal  
6 Organization, N-I-D-A-L, the Al-Aqsa Martyrs  
7 Brigade, Palestine Liberation Front, Palestine  
8 Islamic Jihad, Popular Front for the Liberation  
9 of Palestine, and Popular Front for the  
10 Liberation of Palestine-General Command, correct?

11 **A. That is correct, but my sentence where  
12 I quoted from does not include that. That's in  
13 the previous sentences.**

14 **In other words, I didn't leave  
15 anything out in my quote. There's no ellipses.**

16 Q. Okay. The quote says, "Since Oslo in  
17 1993, these groups have engaged in a variety of  
18 methods of violence."

19 **A. Yes.**

20 Q. Correct?

21 **A. And that's starting -- the sentence**

1 **A. Well, there are a lot of connections.**

2 Q. Tell me what they are.

3 **A. They're Palestinians. They're  
4 composed of people that are Palestinians. It is  
5 an organization that is vying for power with the  
6 Fatah party. Arafat at one time attempted to  
7 co-op them, but they refused, so there's, you  
8 know, there's -- there's not a direct link, but  
9 there is a link.**

10 Q. Any other links that you can name  
11 other than what you've just told me?

12 **A. Well, we know that Arafat, again, made  
13 several attempts and overtures towards Hamas to  
14 have them join a unity government. We know that  
15 Arafat knew that Hamas engaged in violence  
16 against civilians, and we know that Arafat had  
17 responsibility for that violence because he  
18 incited and used Hamas for his own purposes, in  
19 my opinion, to engage in violence.**

20 Q. Anything else?

21 **A. Not in the general sense.**

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1 **you read is several sentences before that  
2 sentence that I quoted.**

3 Q. In the language that you quoted, the  
4 words "these groups" refers to the list of  
5 organizations that I just read to you, right?

6 **A. Yes.**

7 Q. This report does not allege that any  
8 of those groups were, "Under Arafat," right?

9 **A. Incorrect. It's got the group Al-Aqsa  
10 Martyrs Brigade, such as the Fatah-affiliated,  
11 Fatah -- Oh, the Brigade came out of Fatah.  
12 Arafat's the founder of Fatah.**

13 Q. I'm sorry. Where are you reading?

14 **A. I'm reading from the sentence where it  
15 starts, "Most Palestinian militant groups," and  
16 you'll see a dash, "such as Fatah-affiliated  
17 Al-Aqsa Martyrs Brigade." Fatah is the party  
18 that Arafat heads and founded. The Brigade came  
19 out of Fatah. Therefore, there is a connection.**

20 Q. What is the connection between Hamas  
21 and the Palestinian Authority?

1 Q. What are the links between the  
2 Palestinian Authority and the Abu Nidal  
3 Organization?

4 **A. Well, these organizations that are  
5 listed here, they are organizations that exist in  
6 the Palestinian territories, and you would expect  
7 to see, again under my discipline of terrorism  
8 law, that you wouldn't -- you would not expect to  
9 see a direct command and control linkage where  
10 Arafat is sending out direct orders to these  
11 organizations. That's not how they operate.**

12 **So in some cases, the links are clear,  
13 much clearer, for example, when responsibility is  
14 claimed for certain terror attacks. In other  
15 cases, you develop culpability by the actions of  
16 Yasser Arafat and the PLO, how they deal with  
17 these organizations, how they perceive them.**

18 Q. So what is the link between the  
19 Palestinian Authority and the Abu Nidal  
20 Organization?

21 **A. Well, I think that they are -- Arafat**

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1 uses them or has used them, solicited them to,  
2 incited them to engage in violence.

3 Q. Give me one example of what you're  
4 talking about.

5 A. Well, we can look at the speeches that  
6 Arafat has made, public statements about jihad on  
7 numerous occasions, and we can look at the  
8 resolutions that Congress has passed, 426 by a  
9 vote of 365 to 30, where they make certain  
10 findings about the responsibility of the  
11 Palestinian Authority to control the violence and  
12 not to incite violence.

13 Q. Do you think in any of those  
14 materials, you're going to find any reference to  
15 the Abu Nidal Organization?

16 A. Well, again, you would not expect  
17 direct links because that's the modus operandi.  
18 They don't put out. And if they do have direct  
19 communiques, they shred them, destroy them. They  
20 want to engage in terror without suffering any of  
21 the responsibility.

1 Q. That you've made in preparation for  
2 this report?

3 A. No. Not necessarily, no, I have -- I  
4 have notes on books, notes, articles on a variety  
5 of terrorist organizations.

6 Q. Did you consult those notes in writing  
7 this report?

8 A. Yes.

9 Q. They formed the basis for your report?

10 A. In part. My reports also are based on  
11 my experience talking to people.

12 Q. Tell me what link there is between the  
13 Palestine Liberation Front and the Palestinian  
14 Authority.

15 A. Again, I can tell you that the groups  
16 that are associated, that operate within the  
17 territory of the Palestinian areas, the links  
18 are -- it depends on the situation, on the  
19 circumstances, so.

20 Q. Can you point to a single link between  
21 the Palestinian Authority and the Palestine

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1 Q. Who are the leaders of the Abu Nidal  
2 Organization?

3 A. Again, I am not proficient in Arabic.  
4 I can't tell you the names of the leaders, but I  
5 know how these organizations operate, and this is  
6 a classic case of how a Government, in this case  
7 led by Yasser Arafat and the PLO, conducts  
8 terror.

9 Q. When did the Abu Nidal Organization  
10 form?

11 A. I'd have to look at my notes.

12 Q. Was it ever designated as a foreign  
13 terrorist organization?

14 A. I believe it is.

15 Q. What year?

16 A. I'd have to look at my notes.

17 Q. You think it's in your notes?

18 A. I'm sure it is, yes.

19 Q. What notes are you referring to?

20 A. The notes that I do not have with me.  
21 I have a volume of notes back at my office.

1 Liberation Front?

2 A. Give me one second. Let me review my  
3 notes here because -- we do know that the PFLP  
4 was given 50 of the PLO's 100-seat National  
5 Council.

6 Q. Do you think the PFLP is the same  
7 thing as the Palestine Liberation Front?

8 A. The Popular Front for the Liberation  
9 of Palestine?

10 Q. I'm talking about the Palestine  
11 Liberation Front. Do you think that's the same  
12 thing as the PFLP?

13 A. No, that's a different organization.

14 Q. I'm looking for links between the  
15 Palestine Liberation Front and the Palestinian  
16 Authority.

17 A. Well, again, the links would be the  
18 same for a vast majority of these groups. They  
19 have different names, and the links in terms of  
20 culpability is, I guess, what you're asking. If  
21 you're asking, "What is the paperwork, what's the

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1 charter," I don't know.

2 Q. Are you saying that the Palestine  
3 Liberation Front is just a different name for the  
4 Palestinian Authority?

5 A. No. I'm saying that the Palestinian  
6 Authority uses various groups that have evolved,  
7 either on their own or that came out of the Fatah  
8 party. Like we know, for example, the Martyrs  
9 Brigade came out of the Fatah party. Other  
10 terrorist organizations have a more shadowy  
11 history. It's hard to pin down.

12 But in terms of culpability -- and  
13 that's my expertise -- it's not giving you the  
14 history of how these organizations developed and  
15 who founded them, and where did they come from,  
16 and those types of issues. My concern is with  
17 the culpability of the PLO, Yasser Arafat, his  
18 Fatah party vis-a-vis these organizations, and I  
19 believe that he has culpability.

20 Q. You don't know the first thing about  
21 the Palestine Liberation Front, do you?

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1 A. I know that it's a terrorist  
2 organization.

3 Q. Based on what?

4 A. Based on my readings. Based on my  
5 research.

6 Q. What readings and what research are  
7 you referring to?

8 A. I don't understand the question. What  
9 readings? I mean --

10 Q. What readings and what research are  
11 you referring to as support for your statement  
12 that you just made?

13 A. My readings of numerous articles over  
14 the years. My discussions with other terrorism  
15 experts. Again, I can't tell you the history of  
16 many of these organizations -- who headed them,  
17 who founded them, where they developed -- that's  
18 not my expertise.

19 Q. You can't cite me to a single article  
20 you've read about the Palestine --

21 A. Not off the top of my head.

1 Q. -- Liberation Front?

2 MR. YALOWITZ: Let him finish his  
3 question.

4 A. Oh, sorry. Not off the top of my  
5 head, no.

6 Q. Or a single conversation you've had  
7 with a colleague about the Palestine Liberation  
8 Front?

9 A. Not that particular organization, no.

10 Q. Next line of this CRS report that  
11 we've just been looking at states, "The  
12 Palestinians who insist they are engaging in  
13 asymmetric warfare with a stronger enemy point to  
14 the approximately 7,000 deaths inflicted on  
15 Palestinians by Israelis since 1993, some through  
16 acts of terrorism aimed at civilians." Do you  
17 see that sentence?

18 A. I see it.

19 Q. Do you believe that to be a true  
20 statement about the number of deaths inflicted on  
21 Palestinians since 1993?

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1 A. It wouldn't surprise me if it was  
2 true. You're talking about the casualty figures?

3 Q. Yes. Turn to Page 8 of your rebuttal  
4 report.

5 A. I have it.

6 Q. Second sentence, you write, "Gathering  
7 all the pertinent facts, the United States  
8 Congress specifically found that Yasser Arafat  
9 and the forces directly under his control were  
10 responsible for the murder of hundreds of  
11 innocent Israelis and the wounding of thousands  
12 more," correct?

13 A. Yes.

14 Q. Describe what you meant by gathering  
15 all the pertinent facts as it related to House  
16 Resolution 4693, which is the resolution cited at  
17 the end of your sentence.

18 A. Well, again, I'm assessing that our  
19 Congress, before they pass these resolutions by a  
20 vote of 365 to 30 in the case of Resolution 426,  
21 did due diligence in gathering all the pertinent

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1 facts before they would sign their names on this  
2 resolution, as any rational person would do.

3 Q. You say, "Assessing." How did you  
4 make that assessment?

5 A. How do I make the assessment?

6 Q. Let me ask it a different way. You  
7 assumed that they did fact finding.

8 You did not assess it, correct?

9 A. Did I write the report? No, I didn't  
10 write it. I'm making the assumption, yes, that  
11 Congress did due diligence before they put their  
12 name on a House Concurrent Resolution by a vote  
13 of 365 to 30, and I'm giving them that  
14 assessment, yeah.

15 MR. WISE: Can we take a five-minute  
16 break?

17 MR. YALOWITZ: Sure.

18 (Brief Recess.)

19 BY MR. WISE:

20 Q. Professor, can you turn to Page 12 of  
21 your rebuttal report.

1 one.

2 Q. So we're talking about the quote that  
3 was cited in the Levitt piece?

4 A. Yes. I wanted to put that in here,  
5 but I didn't.

6 Q. You just forgot to put it in?

7 A. I forgot to put it in.

8 Q. Other than that one quote that you  
9 forgot, were there others that you considered but  
10 decided not to put in?

11 A. Well, there were a lot of quotes that  
12 I was aware of associated with his desire for  
13 quote, "peace and harmony and brotherhood" and  
14 things of that nature. I did not include those  
15 in there.

16 Q. So the quotations that contradicted  
17 your opinion, you left out of the report?

18 A. Well, I'm not sure that they really  
19 contradicted my opinion. I left them out because  
20 that's what a totalitarian leader does. They  
21 have quotes about peace. And I probably should

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1 Starting on Page 12, you cite to 16  
2 quotations that you list between Pages 12 and 15,  
3 correct?

4 A. Yes.

5 Q. And these quotations were allegedly  
6 made between the years 1996 and 2010, correct?

7 A. You know what, I didn't put the dates  
8 on some of the ones from '09, '10, '11, and '12,  
9 which I should have for consistency, but I  
10 believe that to be true.

11 Q. Were there any quotations of Mr.  
12 Arafat that you considered and did not include in  
13 this list?

14 A. I believe -- well, yes, there was one.  
15 There was one quote from 2001, but I didn't put  
16 it in here.

17 Q. And why not?

18 A. I forgot. I think that's in the first  
19 report, in his incitement of the crowd to --  
20 regarding the 12-year-old boy that was killed, I  
21 don't have that in this one. It's in the other

1 have put some in there to amplify his duplicity.

2 Q. To you, any quotation that Arafat made  
3 calling for peace, calling for cease-fires,  
4 calling for ends to violence were duplicitous?

5 A. At the least, they were highly  
6 suspicious because that's the nature of a  
7 totalitarian dictator, and that's -- in my  
8 opinion, that's what he was. You would have to  
9 take them with a grain of salt, as the idiom  
10 goes.

11 Q. The first two quotes are alleged to be  
12 from speeches Mr. Arafat made in 1996, correct?

13 A. Yes.

14 Q. Four years before the beginning of the  
15 Second Intifada, correct?

16 A. That would be correct.

17 Q. Both from public rallies?

18 A. Yes.

19 Q. How do you reconcile the public nature  
20 of those speeches with the contention that Arafat  
21 was extremely careful to conceal his involvement

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1 in promoting and advocating terror?

2 **A. It depends on the audience. It**  
 3 **depends on the audience and depends on the**  
 4 **context.**

5 Q. Okay. So looking at Quotes 1 and 2 in  
 6 your list, tell me how you reconcile those  
 7 quotations with your contention that Arafat was  
 8 extremely careful to conceal his involvement in  
 9 promoting and advocating terror, assuming that  
 10 those quotes stand for the proposition that you  
 11 allege.

12 **A. One of the problems with democracies**  
 13 **is that they desperately want to believe that the**  
 14 **opponents of democracies will negotiate with**  
 15 **them, and, therefore, they're willing to overlook**  
 16 **statements that would otherwise be offensive.**  
 17 **Because in their desire for peace, they will try**  
 18 **to overlook these types of statements, and**  
 19 **they'll rationalize them by saying that, "Well,**  
 20 **he simply had to say that to the audience."**

21 **So I think that Yasser Arafat, knowing**

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1 **that, that the international community was so**  
 2 **desperate for peace that they would allow him**  
 3 **great latitude, and he played on that.**

4 Q. So it's your view that Arafat, in  
 5 speaking these words, was calling for acts of  
 6 terror, but believed that democracies would look  
 7 the other way because they wanted so badly to  
 8 believe in peace?

9 **A. In many instances, that's correct.**  
 10 **And if you look at the words, themselves, they**  
 11 **are not direct calls in terms of, "Pick up your**  
 12 **guns and follow me." They are shrouded in code**  
 13 **words. As we discussed before, Jihad, Jihad,**  
 14 **Jihad has two meanings. So if he's confronted,**  
 15 **he can simply say, "Well, I was referring to the**  
 16 **'peaceful' meaning." But any reasonable person,**  
 17 **based on the context and the number of statements**  
 18 **that he's made, and his duplicity in peace**  
 19 **negotiations all the way from Camp David back,**  
 20 **would think otherwise.**

21 Q. The third quote is from 1997, correct?

1 **A. Yes.**

2 Q. And in this quotation, Arafat is  
 3 alleged to have used the word "Intifada,"  
 4 correct?

5 **A. Yes.**

6 Q. What is your definition of the term  
 7 "Intifada?"

8 **A. It's an uprising. It's an armed**  
 9 **uprising using violence.**

10 Q. Armed uprising using violence. Does  
 11 it necessarily constitute armed uprising?

12 **A. Well, violence can be used with a rock**  
 13 **or a hand, but generally it refers to violence.**  
 14 **How that violence is portrayed fluctuates from**  
 15 **mortar to a rock. Both can kill you.**

16 Q. Is it your opinion that every time the  
 17 word "Intifada" is used, it is a reference to a  
 18 violent uprising?

19 **A. Not every time. You'd have to look at**  
 20 **the context. In this context, I'd say it's a**  
 21 **call for violence, yes.**

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1 Q. And tell me the context that leads you  
 2 to that conclusion?

3 **A. Just a plain reading of the language.**  
 4 **"Intensify the revolution and the blessed**  
 5 **intifada ... We must burn the ground under the**  
 6 **feet of our invaders."**

7 Q. What was the circumstance of the rally  
 8 at which Arafat made that statement?

9 **A. I believe it was a political rally of**  
 10 **some sort. But, again, I don't speak the**  
 11 **language. I do not know.**

12 Q. Why do you believe that it was a  
 13 political rally?

14 **A. Most of his rallies were associated**  
 15 **with him staying in power, and everything he did**  
 16 **was calculated to maintain his power, expand his**  
 17 **power in his own interest.**

18 Q. Do you have any idea what the  
 19 circumstances of this speech were?

20 **A. I do not know, no.**

21 Q. The fourth quote reads, "The



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1 settlements [Israeli] are a declaration of total  
2 war against the Palestinian people, an open and  
3 destructive war against our people, our land, and  
4 our holy places. The Israeli settlements on our  
5 land, in our Jerusalem and in the rest of the  
6 West Bank are a war against the peace process."  
7 Correct?

8 **A. That's what it says.**

9 Q. What is the Conference of Businessmen  
10 for Jerusalem?

11 **A. I've never attended it. I assume it's  
12 some type of an organization associated with  
13 people that do business in the City of Jerusalem.**

14 Q. Do you know whether its membership is  
15 predominantly Jewish? Predominantly Palestinian?

16 **A. I would assume that the organization  
17 does not have any Jewish members based on the  
18 content of this language.**

19 Q. Why would you assume that?

20 **A. He's advocating basically violence, in  
21 my opinion, against those that are not**

1 Q. How do you know that?

2 **A. Common sense.**

3 Q. Let's take it clause by clause. "The  
4 settlements are a declaration of total war  
5 against the Palestinian people."

6 Do you claim that part of the sentence  
7 is advocating violence?

8 **A. Well, the Palestinian people, back to  
9 the original premise, would not be Jews. These  
10 would be Arabs. And it is not a total  
11 declaration of war. That's inconsistent with the  
12 1993 Oslo Accords. He knows that's not true.**

13 Q. What part of saying, "The settlements  
14 are a declaration of total war against the  
15 Palestinian people," is advocating violence?

16 **A. Well, he's indicating, by using this  
17 inflammatory language, which is false, that  
18 settlements are not a declaration of total war,  
19 because that obviously in the mind of any normal  
20 person means that if I am the object of total  
21 war, I must do something about it, and that would**

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1 **Palestinian that live in Jerusalem and that  
2 occupy what he thinks is his land.**

3 Q. Tell me the specific language in that  
4 quote that you claim is an advocacy of violence  
5 by Mr. Arafat.

6 **A. Well, obviously he believes in this  
7 sentence here that the Israelis, by occupying the  
8 land, are in a state of total war against the  
9 Palestinian people, and, therefore, it's  
10 contradictory, obviously, from the 1993 Oslo  
11 Accords and the reality on the ground.**

12 **But that is -- you know, it's language  
13 that incites. It's language meant to incite, in  
14 my opinion.**

15 Q. You don't know who the listeners were,  
16 right?

17 **A. Well, they're at the Conference of  
18 Businessmen for Jerusalem, which I would assume  
19 were non-Jews. When he says, "Our people, our  
20 land, and our holy places," he's not talking to  
21 Jews.**

1 **be the mind of any person that's reading this,  
2 that he's advocating for me to respond to it.  
3 And like kind at a minimum, which would be meet  
4 violence with violence.**

5 Q. "An open and destructive war against  
6 our people, our land, and our holy places," how  
7 is that a call to violence?

8 **A. Again, he's asking people to respond  
9 to the false claim that the Israeli settlements  
10 constitute illegal violence. It's normal to  
11 assume that if I was a Palestinian reading this  
12 letter, and I think any reasonable person would  
13 read this, that we need to do something about  
14 this. Total war means that -- the term "total  
15 war" indicates disregard for civilians to attack  
16 anything that -- you know, any structure, any  
17 person, any thing. That's total war, which is  
18 illegal. Total war is illegal. You cannot  
19 engage in total war. It's a war crime. You  
20 cannot target civilians. You can't target  
21 civilian facilities.**

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1 And so the implication is that they  
2 are engaging in a total genocide on the  
3 Palestinian people and their holy places, their  
4 land, so I think it's logical to assume that he's  
5 inciting Palestinians to do something in response  
6 to the false claim to justify their use of  
7 violence.

8 Q. And is that the analysis that you made  
9 in including in this sentence in your report?

10 A. Yes.

11 Q. You would agree that the settlements  
12 in the West Bank have been cited as violating  
13 international law, correct?

14 A. No.

15 Q. You don't believe that they have been,  
16 or you don't agree with that conclusion?

17 A. I do not agree with that conclusion.  
18 Resolution 242, I believe, talked about the  
19 Israeli right to peaceful borders, the return of  
20 settlements, not -- the return of territory, not  
21 all the territory if you read the language, and

1 A. No.

2 Q. Do you know whether any of the  
3 original videos were clips spliced together?

4 A. I have not reviewed the videos. I do  
5 not know if they're spliced.

6 Q. Section 5 of your report on Page 15 is  
7 titled, "Finances of the PLO and Arafat,"  
8 correct?

9 A. Yes.

10 Q. What section of the Robinson report  
11 does this section of your rebuttal report rebut?

12 A. Well, again, his claim that there's no  
13 connection between -- no culpability. When I say  
14 connection, I think that's the issue we're really  
15 looking here, is not, again, the nature of the  
16 terrorist organization, how it developed, where  
17 it came from. I'm looking at the culpability of  
18 the PLO, the PA, Yasser Arafat, and so this --  
19 you know, this is a conclusion because it is --  
20 you can't have a terrorist connection unless  
21 there's funding. So when you say there is no

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1 the definite article was left out for a very  
2 specific purpose. So, no, I don't, no.

3 Q. You don't what? You don't believe --

4 A. I don't believe the statement that the  
5 occupation is illegal.

6 Q. Okay. That wasn't my statement. My  
7 statement was: You're aware that they have been  
8 cited as being illegal, correct?

9 A. By some people, yes. Not by me.

10 Q. Seven of the sixteen quotes by my  
11 reading of your footnotes come from Palestinian  
12 Media Watch. Am I counting that correctly?

13 A. Correct.

14 Q. And have you personally viewed those  
15 sources?

16 A. Are you talking about the transcripts  
17 or the actual video itself?

18 Q. Let's start with the transcripts.  
19 Have you viewed the transcripts?

20 A. I have looked at the transcripts.

21 Q. Have you viewed the original videos?

1 terrorist connection, you're also saying there is  
2 no funding.

3 Q. So Robinson didn't talk about the  
4 funding or the finances --

5 A. Well, actually, he did. He did.

6 Q. Okay. So tell me what part he did.

7 A. Well, he is -- most of his critique  
8 was associated with the captured documents,  
9 Israeli captured documents, and in his report, he  
10 went to some length to try to describe these  
11 payments in a way that was, in my opinion,  
12 circular reasoning.

13 Q. And so Section 5 of your report is  
14 intended to rebut Robinson's discussion of the  
15 ODS documents?

16 A. In part.

17 Q. What's the other part?

18 A. Well, I mean in part, yeah. I don't  
19 specifically address the documents in this report  
20 because he admits that -- in my opinion, he  
21 spends great length not attacking the

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1 **authenticity but trying to draw parallels**  
 2 **justifying the payments. Some of the parallels**  
 3 **he drew was, you know, payments that some**  
 4 **governments give to some organizations to buy**  
 5 **their silence, you know, in that context.**

6 Q. You don't refer to the ODS documents  
 7 at all in your rebuttal report, correct?

8 **A. Not in the rebuttal report, no. I**  
 9 **took a broader picture about the finances.**

10 Q. Do you know who Glen Robinson is?

11 **A. I've never met him.**

12 Q. Have you heard of him?

13 **A. I've never heard of him.**

14 Q. You were not familiar with him at all  
 15 before you were asked to write a rebuttal report  
 16 about him?

17 MR. YALOWITZ: Object to the form.

18 **A. I can't say never. I may have met him**  
 19 **at a conference. Who knows? I go to a lot of**  
 20 **conferences, you know, associated with these type**  
 21 **of topics. I can't place him.**

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1 MR. WISE: Professor, I think that's  
 2 all I have.

3 THE WITNESS: Thank you very much.

4 THE REPORTER: Reading and signing?

5 MR. YALOWITZ: Yes, reading and  
 6 signing is a good idea.

7 THE REPORTER: Copy of the deposition?

8 MR. YALOWITZ: You know, what I'd like  
 9 is a regular way copy on -- nothing expedited and  
 10 just by e-mail.

11 THE REPORTER: No hard copy at all?

12 MR. YALOWITZ: I'll have a hard copy  
 13 from the witness so all I need is e-mail so that  
 14 I have an electronic copy. I don't need  
 15 expedited. I don't need rough. Just your  
 16 standard budget style, economy style copy.

17 (Reading and signing requested.)

18 (Deposition concluded at 3:15 p.m.)

19  
 20  
 21

1 CERTIFICATE OF CERTIFIED COURT REPORTER

2 I, CHERYL JEFFERIES, a Certified Court  
 3 Reporter, do hereby certify that the within-named  
 4 witness personally appeared before me at the time  
 5 and place herein set out, and after having been  
 6 duly sworn by me, according to law, was examined  
 7 by counsel.

8 I further certify that the examination  
 9 was recorded stenographically by me and this  
 10 transcript is a true record of the proceedings.

11 I further certify that I am not of  
 12 counsel to any of the parties, nor in any way  
 13 interested in the outcome of this action.

14 As witness my hand this 11th day of  
 15 October, 2013.

16

17

-----  
 Cheryl Jefferies

18 Certified Court Reporter

19

20

21

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1 DATE SENT: October 11, 2013  
 2 ERRATA SHEET  
 3 DEPOSITION OF: Jeffrey Addicott  
 4 DATE: October 2, 2013  
 5 CASE: Mark Sokolow, et al vs. The  
 6 Palestine Liberation Org, et al

## INSTRUCTIONS:

1. Please read the transcript of your deposition  
 and make note of any corrections or changes  
 on this Errata Sheet.

2. Indicate below general reason for change,  
 such as:  
 A. To correct stenographic error.  
 B. To clarify record.  
 C. To conform to the facts.

3. Sign the Certificate of Deponent page.

4. Within 30 days of the Date Sent, return this  
 Errata Sheet, and signed Certificate of  
 Deponent, to the Attorneys listed on the  
 Appearance page.

PAGE # LINE # CORRECTION REASON

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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## 1            ERRATA SHEET

2    DEPOSITION OF JEFFREY ADDICOTT:

3    PAGE #   LINE #   CORRECTION            REASON

4    \_\_\_\_\_

5    \_\_\_\_\_

6    \_\_\_\_\_

7    \_\_\_\_\_

8    \_\_\_\_\_

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18   \_\_\_\_\_

19   \_\_\_\_\_

20   \_\_\_\_\_

21   \_\_\_\_\_

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## 1            CERTIFICATE OF DEPONENT

2            I hereby certify that I have read and  
3   examined the foregoing transcript and:

4   (Check one of the following)

5            ( ) The same is a true and accurate  
6   record of the testimony given by me, and I have  
7   made no corrections to this transcript.

8            -OR-

9            ( ) Any additions or corrections  
10   that I feel are necessary, I have listed on the  
11   attached Errata Sheet.12            As witness my hand and signature this  
13   \_\_\_\_\_ day of \_\_\_\_\_.15            -----  
16            JEFFREY ADDICOTT

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